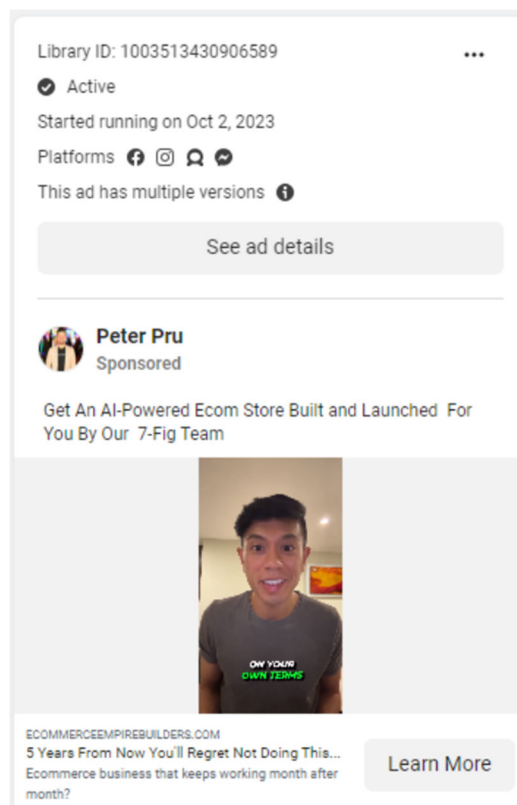


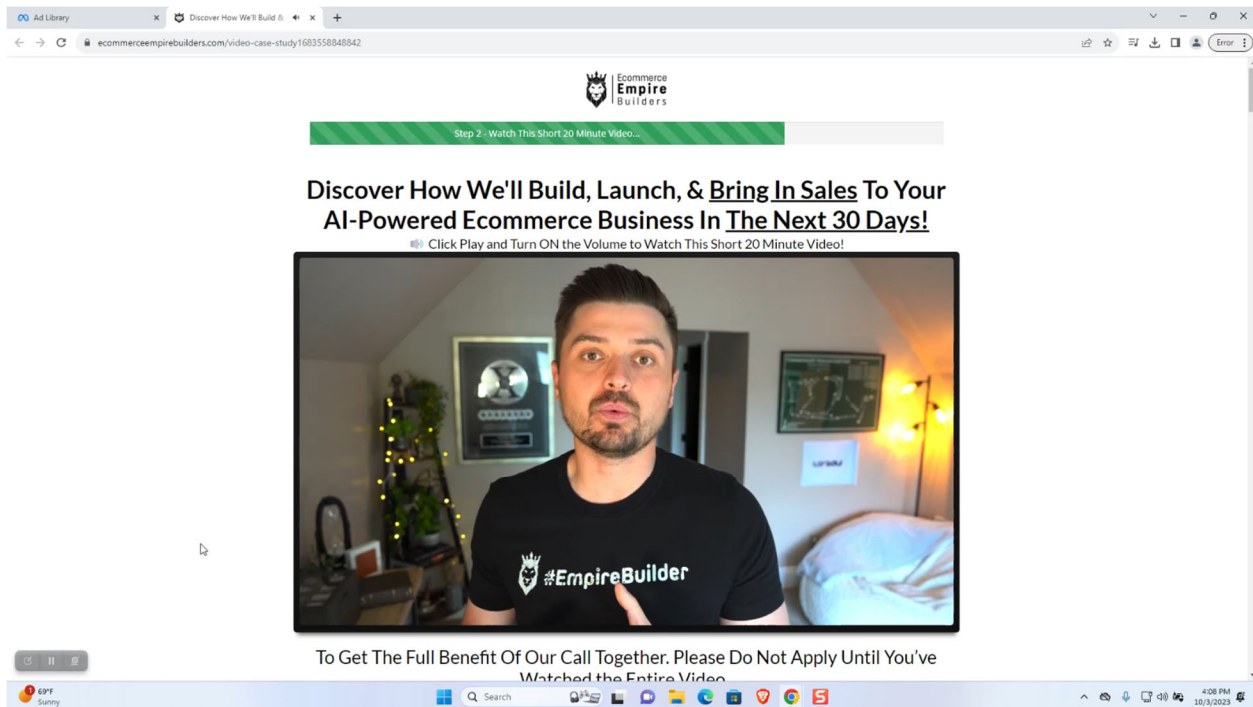
DECLARATION OF REEVE TYNDALL
Pursuant to 28 U.S.C. § 1746

I, Reeve Tyndall, hereby state that I have personal knowledge of the facts set forth below and, if called to testify, I could and would testify as follows:

1. I am a United States citizen. I work as a Senior Investigator for the Federal Trade Commission (“FTC”) in the Bureau of Consumer Protection’s Division of Marketing Practices. The Division of Marketing Practices investigates persons and entities that may be violating the FTC Act and other laws enforced by the FTC.
2. On October 3, 2023, I visited the Facebook Ad Library at facebook.com/ads/library/. The Ad Library contains paid advertisements on Meta’s social media platforms, including Facebook and Instagram. The Ad Library contained approximately 63 ads under the account “Peter Pru.” I captured the ads and linked sales page. **Attachment A** are screenshots of my capture and **Attachment B** is a transcript of my capture. Below is a screenshot of one of the ads:



3. The Facebook advertisements contained a hyperlink to *ecommerceempirebuilders.com*. The page contained a video presentation for a free training featuring Peter Pru.



4. Mr. Pru made the following statements during the video presentation:
- “And I don’t want to bore you with a ton of screenshots, though, but you can see Nata here is somebody that we built and launched a business for, and she did hit our \$10,000 per month club.”
 - “If you see on the screenshot here, Carolyn here, after four days, made her first 250 – over \$250 in sales. And Tricia here with her first sales ever in e-commerce, and we have a ton of these screenshots of people in our \$10,000-per-month club, \$50,000 per month club.”
 - “And we list out all of our success stories. I can’t even fit them all on this page, but we have a running list, live list, so if you ever want to see all of our seven-figure club award winners, our \$50,000-per-month award winners and \$10,000-per-month winners, you can head over to EcommerceEmpireBuilders.com and you can see all of them.”
 - “And I’m showing you guys this because this is a program for those of you that are just getting into e-commerce and those of you that obviously want to scale your existing e-commerce business as well, we can help you with, and we have a huge page of these – of these testimonials or interviews of people that hit our 10,000-a-month club.”

- “But I want you to know that the e-Commerce Empire Builders are here to help you grow not just to make your first sales but to help you grow to \$10,000 a month, 50,000 a month, and get you even to out seven-figure club as well.”
- “So who is our e-commerce platinum program for? Well, number one, this is for normal, everyday people that work a nine-to-five job. You have more money than time, and you want to start that journey to making money online. This is also for those of you that are existing e-commerce business owners that are working way too hard and not making enough money... This is also for those of you struggling with getting an e-commerce business off the ground and making that predictable money... And this is especially for those of you that feel overwhelmed or you’ve tried an online course or an online business and you’ve gotten absolutely no results... And this is especially also for those of you that want to really capitalize on artificial intelligence, on AI, and really embrace it.”
- “We increased revenue by 42,932 percent. There is not many things in life that you get that kind of return.”

5. Mr. Pru’s presentation included the following consumer testimonials:

- “Selina Made \$10,000 In Her Second Month With Our Ecommerce Platinum Program!” and Selina made “Her FIRST \$10k With One Product Dropshipping!”
- “Natalia Made \$10,000 In Her First Month With Our Ecommerce Platinum Program!” and Natalia made “10k Selling 1 Product”
- “Quanq Made \$40,000 In Three Months With Our Ecommerce Platinum Program!” and Quanq went from “\$0 to \$40,000+ In ONLY 3 Months With Dropshipping Sales Funnels!”
- “Justin & Lindsay Made \$12,000 In 12 Days With Their DFY Ecommerce Business”
- “Russ Makes \$10,000 Per Month With His DFY Ecommerce Business!”
- “Natasha Makes \$5,100 Per Month With Her DFY Ecommerce Business!”
- “Maria Makes \$500+ Per Week With Our Ecommerce Platinum Program!”

6. After Mr. Pru's video presentation ended, the webpage prompted me to complete a questionnaire and schedule a call to learn more, which I did using an undercover identity. The page also contained hyperlinks to the following documents:

- a) ***Terms and Conditions*** which states: "This website ("Site") is owned and operated by Empire Holdings Group." (**Attachment C**).
- b) ***Privacy Policy*** which states: "The following Privacy Policy governs the online information collection practices of Empire Holdings Group" and included the contact email peter@ecommerceempirebuilders.com (**Attachment D**).
- c) ***Contact Us*** which included the email address peter@ecommerceempirebuilders.com. (**Attachment E**)

7. On October 6, 2023, I received a missed call from (215) 965-1473. I called the number back and spoke with Thomas Hutkowski ("Tom") from Ecommerce Empire Builders. Tom asked me a few questions about myself and briefly reviewed the business opportunity. Tom then scheduled me for a follow up call. I recorded the call. A transcript of the call is **Attachment F**.

8. On October 9, 2023, I received a call from Tom at (215) 965-1473. Tom told me the company offered a "Done For You" business opportunity. He told me the company had over a hundred clients making over \$100,000 per year. I told Tom I wanted to look at a service contract and we scheduled a follow up call. I recorded the call. A transcript of the call is **Attachment G**. Tom made the following statements during the call:

- "Now, the main element is you don't even have to worry about any of that at all. Okay? We're going to build everything for you. And what that means to you is, you know, you're going to be able to, in 30 days, when the store goes live, start bringing in profits at day 30 of starting with us. Okay?"

- “And what that means to you is instead of stressing on the first of the month like a lot of businesses, because they start out at, you know, zero sales, you’re already going to have dozens, obviously working towards hundreds, of sales being made from back-end subscriptions to scale your monthly profits a lot easier and faster. Okay?”
- “Yeah, correct. So making sales, and then as far as our front-end sales, we’re going to shoot around 30 to 40 percent profit, and then our back-end we’re going to shoot about, you know, 50 to 70 percent profit from back-end subscriptions.”
- “Okay. That definitely can be feasible. I mean, it’s going to be a process to work up to that. It’s not going to be – you know, obviously a lottery ticket. It’s going to take work to work up to that. But it’s definitely -- definitely would be feasible. You know, we have – we have hundred – hundred-plus people in the 100K club. You know, that’d be over 10 – 10K per month.”

9. On October 10, 2023, I received an email from Peter Pru [noreply@mail.hellosign.com] with a document titled “Ecommerce Platinum Program”. The contract party was listed as EMPIRE HOLDINGS GROUP, LLC a Wyoming Limited Liability Company with its principal place of business at 2370 York Rd., Jamison, PA 18929. The contract price was \$10,000. Peter Pru signed the contract as CEO. **Attachment H** is a copy of the contract. I did not sign the contract. The contract contained the following Non-Disparagement Clause:

11. Non-Disparagement. Each Party agrees for itself and all others acting on its behalf, either directly or indirectly: (i) Not to publish, repeat, utter and/or report any statement or observation, nor to take, encourage, induce or voluntarily participate in any conduct or action, that would negatively comment and/or reflect on, disparage, defame, impugn and/or call into question any other Party and/or any other Party’s business operations, policies, practices and/or conduct or that of its directors, officers, members, shareholders, agents, employees, and/or affiliates; (ii) Not to act in any way with respect to any other Party’s business operations, practices, policies and/or conduct that would impugn and/or damage any other Party’s reputation, business relationships or present or future business, or the reputation of any other Party’s past or present directors, officers, members, executives, shareholders, agents, employees or affiliates; and (iii) Not to comment about any other Party to any person or entity, including, but not limited to, the press (in any medium or format) or any other Party’s customers and/or vendors concerning any Party’s business operations, policies or conduct and/or actions. All Parties acknowledge that this provision is a material term of this Agreement, the violation of which shall be deemed a material breach hereunder.

10. On October 10, 2023, after I received the contract, I met with Tom via Zoom. Tom asked me if I wanted to move forward. I replied affirmatively. Tom then asked for my payment details on the call. I ended the Zoom call and did not complete the purchase. I recorded Zoom call. A transcript of the call is **Attachment I**. Tom made the following statements during the call:

- “No. There’s going to be – it’s drop shipped directly from the manufacturer. So once you make a sale, that money goes and it gets fulfilled from the warehouse to the customer, and then you get the percent – profit margin on that, in a sense... You’re not going to have any money tied up in inventory.”
- “Yea. Ballpark, I mean, front end sales, we want to shoot for 30/40 percent profit margin. And the back end subscriptions sales, okay, people that are going into upsells and downsells of the back end sales, we want to shoot for like 50 to 80 percent profit margin on that. Okay?”
- “You already have the customer’s email and phone to (inaudible) which, you know, we – we – we write that copy for you, as well, you know, emails, et cetera, to market to them and sell products to them, you know, because they’re already in your ecosystem. You’re going to have a lot higher profit margin on back end sales.”

11. During my undercover investigation, Ecommerce Empire Builders and its representatives did not provide me any disclosure document in compliance with the FTC’s Business Opportunity Rule.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 10, 2024 in Washington, DC.



Reeve Tyndall

Attachment A

Ad Library

facebook.com/ads/library/?active_status=all&ad_type=all&country=US&view_all_page_id=104802937646712&search_type=page&media_type=all

Meta

United States All ads Peter Pru

Keyword Filters

Launched October 2023

Library ID	Status	Started running on	Platforms	Ad Description	Image	Learn More
1003513430906589	Active	Started running on Oct 2, 2023	Facebook, Instagram, Messenger	Get An AI-Powered Ecom Store Built and Launched For You By Our 7-Fig Team		Learn More
2010857482612295	Active	Started running on Oct 2, 2023	Facebook, Instagram, Messenger	Get An AI-Powered Ecom Store Built and Launched For You By Our 7-Fig Team		Learn More
1381052439267497	Active	Started running on Oct 2, 2023	Facebook, Instagram, Messenger	Get An AI-Powered Ecom Store Built and Launched For You By Our 7-Fig Team		Learn More
101361255221091	Active	Started running on Oct 2, 2023	Facebook, Instagram, Messenger	Get An AI-Powered Ecom Store Built and Launched For You By Our 7-Fig Team		Learn More
990600252248597	Active	Started running on Oct 2, 2023	Facebook, Instagram, Messenger	Get An AI-Powered Ecom Store Built and Launched For You By Our 7-Fig Team		Learn More

Launched September 2023

Library ID	Status	Started running on	Platforms	Ad Description	Image	Learn More
195888250179349	Active	Started running on Sep 20, 2023	Facebook, Instagram, Messenger	Get An AI-Powered Ecom Store Built and Launched For You By Our 7-Fig Team		Learn More
875108687534885	Active	Started running on Sep 20, 2023	Facebook, Instagram, Messenger	Get An AI-Powered Ecom Store Built and Launched For You By Our 7-Fig Team		Learn More
781061240486937	Active	Started running on Sep 20, 2023	Facebook, Instagram, Messenger	Get An AI-Powered Ecom Store Built and Launched For You By Our 7-Fig Team		Learn More
145476378401194	Active	Started running on Sep 20, 2023	Facebook, Instagram, Messenger	Get An AI-Powered Ecom Store Built and Launched For You By Our 7-Fig Team		Learn More
1243852739641143	Active	Started running on Sep 20, 2023	Facebook, Instagram, Messenger	Get An AI-Powered Ecom Store Built and Launched For You By Our 7-Fig Team		Learn More

Discover How We'll Build, Launch, & Bring In Sales To Your AI-Powered Ecommerce Business In The Next 30 Days!

Click Play and Turn ON the Volume to Watch This Short 20 Minute Video!

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Ad Library x Discover How We'll Build 5 x +

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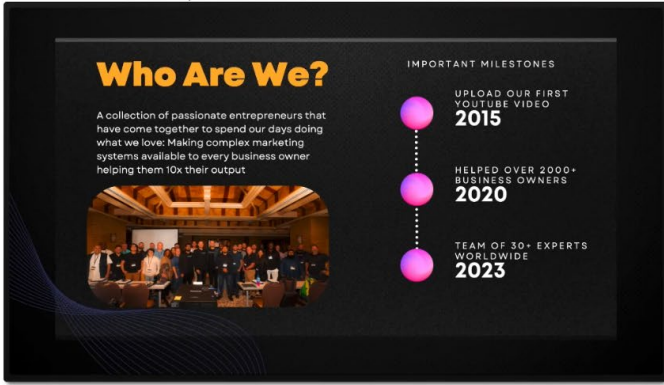
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FTC-000254

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Who Are We?

A collection of passionate entrepreneurs that have come together to spend our days doing what we love: Making complex marketing systems available to every business owner helping them 10x their output

IMPORTANT MILESTONES

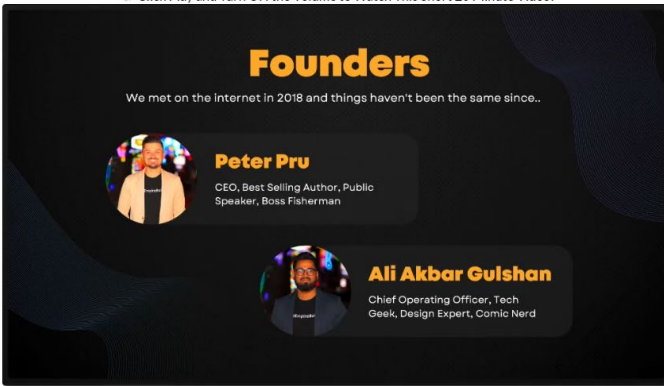
- UPLOAD OUR FIRST YOUTUBE VIDEO **2015**
- HELPED OVER 2000+ BUSINESS OWNERS **2020**
- TEAM OF 30+ EXPERTS WORLDWIDE **2023**

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Founders

We met on the internet in 2018 and things haven't been the same since..

Peter Pru
CEO, Best Selling Author, Public Speaker, Boss Fisherman


Ali Akbar Gulshan
Chief Operating Officer, Tech Geek, Design Expert, Comic Nerd

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WHO THIS IS FOR...

- NORMAL EVERY DAY PEOPLE THAT WORK A 9-5, HAVE MORE MONEY THAN TIME, AND WANT TO START THEIR JOURNEY TO MAKING MONEY ONLINE
- EXISTING ECOMMERCE BUSINESS OWNERS THAT ARE WORKING WAY TO HARD AND NOT MAKING ENOUGH
- PEOPLE STRUGGLING WITH GETTING AN ECOMMERCE BUSINESS OFF THE GROUND OR MAKING PREDICTABLE MONEY
- IF YOU'VE FELT OVERWHELMED OR TRIED AN ONLINE COURSE OR ONLINE BUSINESS IN THE PAST AND GOT NO RESULTS.

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ALSO FOR THOSE WHO WANT TO CAPITALIZE ON AI



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EARNING DISCLAIMER!

- THIS IS **NOT** "GET RICH QUICK"
- WE WILL BUILD THIS ENTIRE BUSINESS FOR YOU, BUT YOU STILL MUST **DO YOUR PART**

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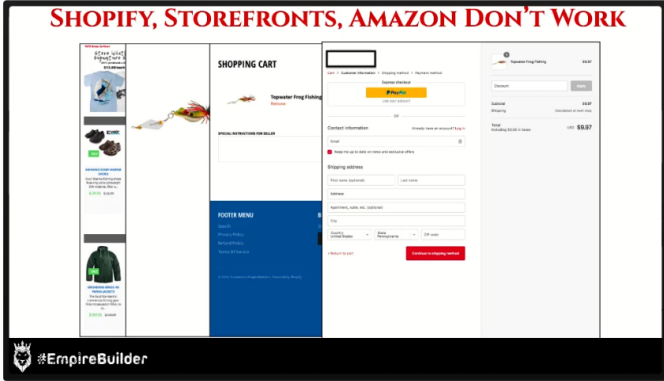
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SHOPIFY, STOREFRONTS, AMAZON DON'T WORK



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\$9.97 (REVENUE)
\$3.00 (PRODUCT COST)
\$2.00 (SHIPPING COST)
= \$4.97 (PROFIT)

WHAT ABOUT ACQUIRING THE CUSTOMER?
\$5.00 (PAID ADS)

\$4.97 - \$5.00 = -0.03c!
WE LOST MONEY!

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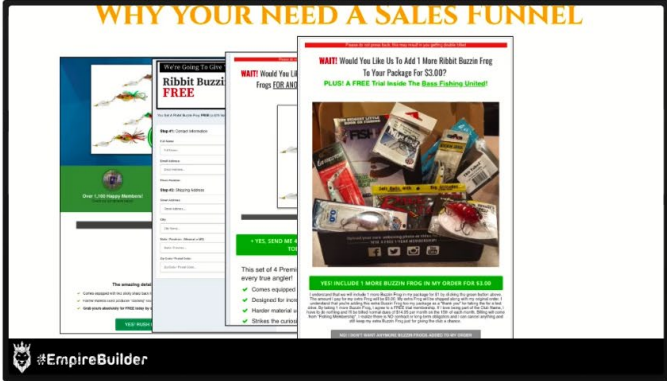
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WHY YOUR NEED A SALES FUNNEL



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LET'S SEE THE NUMBERS...

\$9.97 (X1 FISHING LURE BOUGHT)
 \$12.97 (ORDER BUMP BOUGHT)
 \$24.97/MO (SUBSCRIPTION UPSSELL #2 BOUGHT)
TOTAL: \$47.91!
 \$3.00 EA. X \$3.00 = \$9.00 (PRODUCT COST)
 \$2.00 (SHIPPING COST)
 = \$36.91 (PROFIT)

WHAT ABOUT ACQUIRING THE CUSTOMER?
 \$5.00 (PAID ADS)

\$36.91 - \$5.00 = \$31.91!
WE MADE MONEY + WILL MAKE MONEY EVERY MONTH FOR FREE!

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1 CUSTOMER IN SHOPIFY = -\$.03
1 CUSTOMER IN FUNNEL = \$31.91

100 CUSTOMERS IN SHOPIFY = -\$3.00
100 CUSTOMERS IN FUNNEL = \$3,191.00

1,000 CUSTOMERS IN SHOPIFY = -\$30.00
1,000 CUSTOMERS IN FUNNEL = \$31,910.00

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shopify COURTESY BLOG BOOKS PARTNER PERKS PARTNER ACADEMY

Articles Guides Newsletters Events Tools Shopify Tutorials

Why Every Shopify Store Needs a Marketing & Sales Funnel

By Andrew Chen · 10/1/2023

The key to any successful business is a healthy sales funnel. This is especially true for ecommerce stores whose survival relies on transforming their site visitors from casual browsers into committed customers.

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2,000 AmazonBasics products

It has since become the best-selling private label brand on Amazon. There are now more than 2,000 AmazonBasics products sold at the e-commerce giant, from batteries to puppy pee pads. Jun 14, 2019

THE WALL STREET JOURNAL

Amazon.com Inc. has adjusted its product-search system to more prominently feature listings that are more profitable for the company, said people who worked on the project—a move, contested internally, that could favor Amazon's own brands.


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THERE IS NO INVENTORY OR PACKING/ SHIPPING YOUR OWN PRODUCTS

THE DROPSHIPPING MODEL

Customer Places Order
Pay you Retail Price

Forward Order to Your Supplier and Pay Wholesale

Supplier Ships the Product Directly to Your Customer

You make \$\$\$ Profit

#EmpireBuilder

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ECOMMERCE SET TO BE A \$7.3 TRILLION DOLLAR INDUSTRY

statista The Statistics Portal
Reports and Studies from More Than 22,000 Sources

Retail e-commerce sales worldwide from 2014 to 2025
(in billion U.S. dollars)

Year	Sales (in billion U.S. dollars)
2014	1,000
2015	1,200
2016	1,400
2017	1,600
2018	1,800
2019	2,000
2020	2,200
2021	2,400
2022	2,600
2023	2,800
2024	3,000
2025	3,200

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Nilesh If signed up with peter in early january for a dfy program. Probably one of the first ones, if not the first. I have had wonderful support and help from his whole team. Tried running the business on my own but could not due to time constraints so handed it back to his team to run all the ads for me. Probably the best decision I made. Sales will hit over 11000 this month (five weeks since he took over). Have also signed up for additional funnels and work with his team over the last 2 weeks. Not trying to convince anyone but i have had a wonderful experience so far. He has been available any time i have needed help or have had questions. No get quick rich schemes around that i know of...i signed up for this knowing full well its going to take time. One thing i know ishaving realistic expectations helps.

#EmpireBuilder

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Step 2 - Watch This Short 20 Minute Video...

Discover How We'll Build, Launch, & Bring In Sales To Your AI-Powered Ecommerce Business In The Next 30 Days!

Click Play and Turn ON the Volume to Watch This Short 20 Minute Video!

The video player displays a dashboard with the following metrics:

- EARNINGS PER CLICK: \$0.88
- GROSS SALES: \$1,269.51
- AVERAGE CART VALUE: \$20.48

Below the metrics is a table with columns: Page Views, Sales, Orders, Profit, and Revenue. The table lists data for various pages and products.

#EmpireBuilder

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The video player displays a dashboard with the following metrics:

- EARNINGS PER CLICK: \$0.94
- GROSS SALES: \$3,790.68
- AVERAGE CART VALUE: \$20.83

Below the metrics is a table with columns: Page Views, Sales, Orders, Profit, and Revenue. The table lists data for various pages and products.

#EmpireBuilder

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ecommerceempirebuilders.com/video-case-study1683558848842

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Step 2 - Watch This Short 20 Minute Video...

Discover How We'll Build, Launch, & Bring In Sales To Your AI-Powered Ecommerce Business In The Next 30 Days!

Click Play and Turn ON the Volume to Watch This Short 20 Minute Video!

EARNINGS PER CLICK **\$1.15**

GROSS SALES **\$10,658.57**

AVERAGE CART VALUE **\$21.19**

	Page Views	Visitors	Subs	Revenue	Profit	Margin	Subs	Margin	Revenue	Profit
Squeeze Page	9,271	7395	3,889	38.04%	\$123	6.82%	\$4,991.21	0	\$0.00	\$0.97
OT01 - Key Chain	561	480	55	12.22%	53	11.78%	\$763.41	0	\$0.00	\$1.41
OT02 - x2 Pendants	940	418	15	3.59%	16	3.39%	\$349.58	0	\$0.00	\$0.85
OT03 - Crystal Club	619	410	21	5.12%	21	5.12%	\$524.97	3	\$0.03	\$0.85
Thank You	775	476	-	-	-	-	-	-	-	-

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LET'S SEE THE NUMBERS...

\$15,718.76 - TOTAL REVENUE

+ \$624.25 PER MONTH - 25 SUBSCRIPTIONS!

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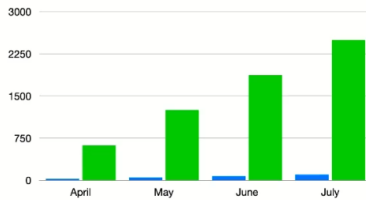
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Click Play and Turn ON the Volume to Watch This Short 20 Minute Video!

LET'S SEE THE NUMBERS...

100 MONTHLY SUBSCRIBERS = \$29,964 PER YEAR!



Month	Subscribers (approx.)
April	500
May	1000
June	1500
July	2000

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LET'S SEE THE NUMBERS...

MARGINS:

FRONTEND SALE - 20%

UPSELLS & SUBSCRIPTION - 50%

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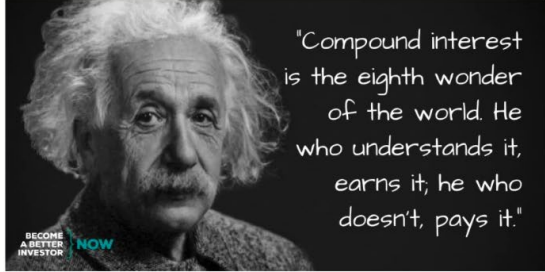
Ad Library Discover How We'll Build 6

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Discover How We'll Build, Launch, & **Bring In Sales** To Your AI-Powered Ecommerce Business In **The Next 30 Days!**

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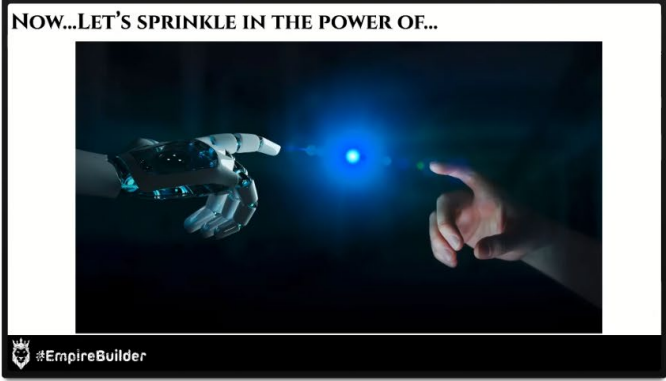
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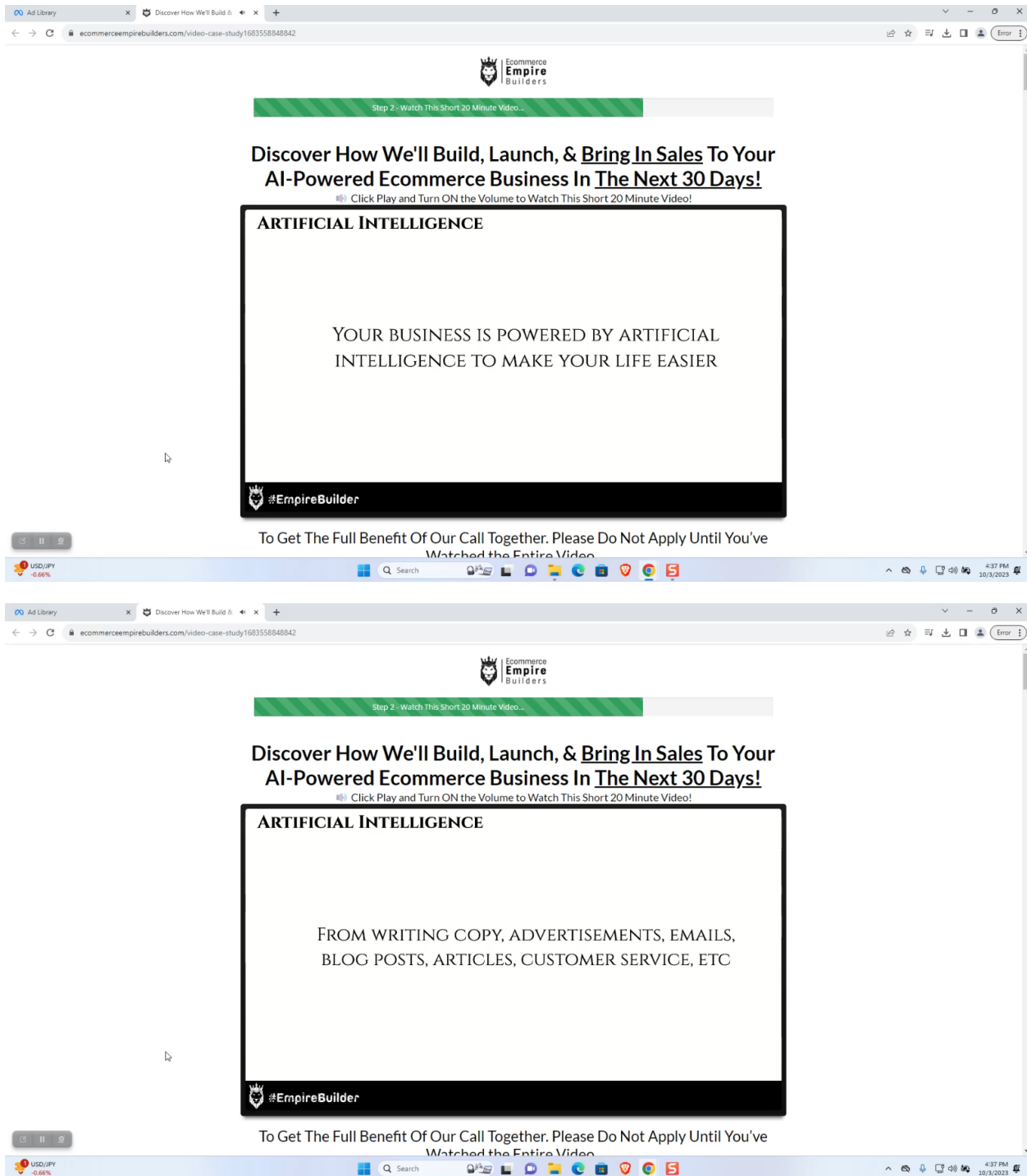
NOW...LET'S SPRINKLE IN THE POWER OF...



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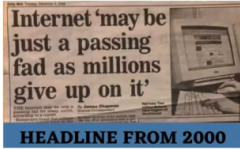
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ARTIFICIAL INTELLIGENCE

WHAT IF YOU STARTED TO MAKE MONEY ONLINE IN EARLY 2000? WOULD PEOPLE OF CALLED YOU CRAZY? YES...



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ARTIFICIAL INTELLIGENCE

THIS SORT OF BREAKTHROUGH WE MAY ONLY GET ONCE OR TWICE IN OUR LIFETIMES.

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WE ARE THE AI ECOMMERCE AUTHORITY

Fortune • Follow

Experts say there are 'no technical skills required' for this A.I. job that pays six figures

Story by Connor Wright • Mar 21

Unique perspectives

Peter Phu, CEO of Ecommerce Empire Builders, which designs and grows online sales platforms, has hired and trained two prompt engineers, both of whom are earning six figures a year.

Phu told Fortune that while a "lot of" technical background is important, diverse backgrounds are valuable in bringing unique experience to an ever-evolving platform.

Prompt engineers at his Philadelphia-based company, he explained, are tasked with working with teams from design to research and development to create inputs which will result in an effective outcome for clients. They also test new prompts to generate unique responses which can then be fed back to clients to adapt or improve services.

Training more prompt engineers is "absolutely" something the company would consider again in the future, he said, noting that while the training process could be "time-consuming," he saw it as an investment in success.

"Training typically involves teaching them about A.I. language models like ChatGPT, as well as the intricacies of prompt design and optimization," he told Fortune.

"With tools like ChatGPT, it's not just about asking random questions, its more about engineering prompts to get unique responses. Additionally, they need to learn how to analyze prompt performance and collaborate effectively with researchers, designers, editors, and marketing managers."

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Eric
2 reviews • US

★★★★★

The only thing that doesn't change is the fact that everything changes!

Ecommerce is a place for people who dare to compete on constantly changing landscape. It is a super highway that goes from being the Autobahn, to an off road mud pit all within the blink of an eye. All too often the wreckage of many of the would be "ecommerce gurus" once touting their viral products to eager audiences, can now be seen littering the lifeless surroundings.

It is in precisely this environment that the Ecommerce Empire Builders stand out far above the crowd. They have consistently out performed the naysayers, the doomers and gloomers, the skeptics, and the fake gurus to build a system that is both unique, and superior to all their competitors in the space!

If you looking for a place where you can learn, grow and expand your knowledge of ecommerce, and digital marketing, while at the same time have a business built entirely for you, then you've come to the right place!

#EmpireBuild Would highly recommend!

To Get The Full Benefit Of Our Call Together. Please Do Not Apply Until You've Watched the Entire Video.

1-405 N Accident

4:40 PM 10/3/2023

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Click Play and Turn ON the Volume to Watch This Short 20 Minute Video!

Frederick Nibbaw 10:34pm

Im super happy guys! Cant thank you enough! First subscriber just signed up!!
12 days since launch btw! Amazing results!!

Jason 10:34pm

Hey Everyone! I want to take a moment to thank Peter and the rest of the team for the amazing work they've done on my store! I'm a complete newbie at Ecom and within the first day of launching I was already doing sales of 1000+ a day consistently! (wasn't expecting it to take off that quick!) I am very satisfied with the prompt customer service and return of emails regarding any issues I had and still do! Peter and the team has responded to me every time within minutes! I know it can get confusing for everyone in the group but I can promise that with Peter's guidance you all will be successful! Thank you Ecom Empire Builders!!

2 Comments Seen by 11

Today Yesterday This week This month

Total sales \$1.35k
53 orders
View dashboard

44 orders to fulfill

2 Comments Seen by 25

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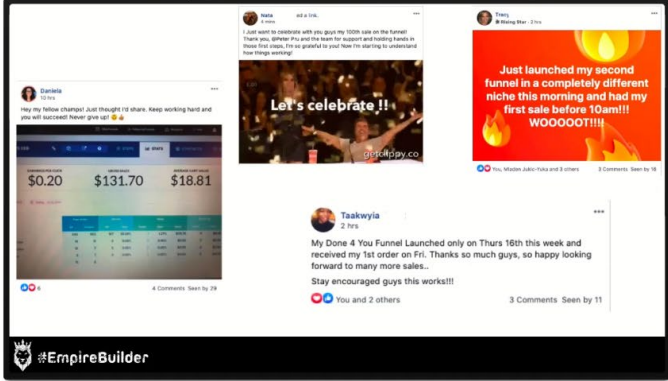
Search

4:41 PM 10/3/2023

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Click Play and Turn ON the Volume to Watch This Short 20 Minute Video!



The video player displays a collage of social media posts and a sales dashboard. The posts include:

- A post from "Dantele" (12 hrs) showing a sales dashboard with figures: \$0.20, \$131.70, and \$18.81. The text says: "hey my yellow changer! Just thought I'd share. Keep working hard and you will succeed! Never give up! 🙌🏻"
- A post from "Taakwyia" (2 hrs) saying: "My Done 4 You Funnel Launched only on Thurs 16th this week and received my 1st order on Fri. Thanks so much guys, so happy looking forward to many more sales... Stay encouraged guys this works!!!"
- A post from "Boris" (4 hrs) saying: "I just want to celebrate with you guys my 100th sale on the funnel! Thank you, Empire for just the boost for support and training from the first case. For so grateful to you now I'm starting to understand how things working!"
- A post from "Boris" (4 hrs) saying: "Just launched my second funnel in a completely different niche this morning and had my first sale before 10am!!! WOOOOOT!!!!"

The video player also shows a sales dashboard with the text "Let's celebrate!!" and "gofundmy.co".

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68°F Sunny

4:42 PM 10/3/2023

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Discover How We'll Build, Launch, & Bring In Sales To Your AI-Powered Ecommerce Business In The Next 30 Days!

Click Play and Turn ON the Volume to Watch This Short 20 Minute Video!



The video player displays a success story for the Ecommerce Platinum Program. The text reads:

Ecommerce Platinum Program Success Stories!

Selina Made \$10,000 In Her Second Month With Our Ecommerce Platinum Program!

The video player also shows a thumbnail for a video titled "New FIRST \$10K with One Product Dropshipping! | Peter Pru & Ecommerce Empire Builders". The thumbnail features the text "\$10K IN REVENUE SELLING ONE PRODUCT" and logos for "Clickfunnels" and "AliExpress".

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Discover How We'll Build, Launch, & Bring In Sales To Your AI-Powered Ecommerce Business In The Next 30 Days!

Click Play and Turn ON the Volume to Watch This Short 20 Minute Video!

Your Membership Includes
You Will Have Access To The Following

- 1 Ecommerce Empire Academy - A 7 week in-depth training program designed to accelerate your knowledge
- 2 Weekly Live Coaching Calls - Three times per week you get direct access to the inner circle coaches via live calls for enhanced training, question & answer sessions & in-depth funnel reviews
- 3 On Demand Support - You will be part of our exclusive inner circle group where all questions asked are answered within 24 hours with a personal screen recorded message
- 4 Funnel Build - The EEB team will build & launch your entire eCommerce business 100% for you!

INNER CIRCLE FOR LIFE

#EmpireBuilder

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FUNNEL BUILD
How We Build Your Ecommerce Sales Funnel

01 FULL SERVICE BUILD

Over the next 30 days the entire Ecommerce Empire Builders team will be doing in-depth to build your Ecommerce Subscription Sales Funnel. How the next 30 days look like for you:

- Day 1-5 - Introduction & Kickoff Call
- Day 5-7 - Funnel Offer Creation
- Day 7-14 - Strategy & Progress Call
- Day 14-19 - Copy Research & Funnel Development
- Day 19-22 - Funnel Copy & Graphics
- Day 22-25 - Facebook Ad Copy & Graphics
- Day 25-28 - Email Sequence Development
- Day 28-30 - Funnel Launch

02 FULL SERVICE LAUNCH

- Three times per week you get direct access to the Inner Circle coaches via live calls for enhanced training, question & answer sessions & in-depth funnel reviews
- You will be part of our exclusive Bootcamp where all your questions asked are answered within a few hours with a personal screen recorded message or text message
- We launch your funnel to verify stats as well as bring in your initial sales within 30 days of our kickoff call. We use our own money to test your advertisements & sales funnel.

#EmpireBuilder

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Click Play and Turn ON the Volume to Watch This Short 20 Minute Video!

THE INNER CIRCLE

Reconnect To The Empire Builder Inner Circle

- Weekly Live Coaching Calls**
Three times per week you get direct access to the Inner Circle coaches via live calls for enhanced training, question & answer sessions & in-depth funnel reviews
- Instant Over The Shoulder Support**
You will be part of our exclusive Inner Circle where all your questions asked are answered within 24 hours with a personal screen recorded message
- Private Training Vault**
You will have access to the private Inner Circle training vault which includes trainings, scripts, & advanced eCommerce scaling lessons
- 8-Figure Business Case Study**
In-depth behind the scenes experience of the launch and scaling of our next 8 figure business - Untapped Focus

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ECOMMERCE EMPIRE ACADEMY

What You Go Inside The Ecommerce Empire Academy

- Ecommerce Empire Academy**
Our 7 week in-depth training program designed to accelerate your knowledge
- Elite Mastermind**
Strategize, collaborate, and get help from previous students that were once in the same spot as you!
- Weekly Q&A And Recordings**
Get your questions answered every single week by both Peter & other 5-10K Club & 500K Club members!

#EmpireBuilder

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YOUR NEXT STEPS

- CLICK BELOW TO FILL OUT THE APPLICATION IN DETAIL TO SEE IF YOU QUALIFY!
- IF YOU QUALIFY FOR A CALL, PLEASE MAKE NOTE OF DATE & TIME. WE RESPECT YOUR TIME, SO PLEASE RESPECT OURS

#EmpireBuilder

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BUSINESS BUYBACK PROGRAM

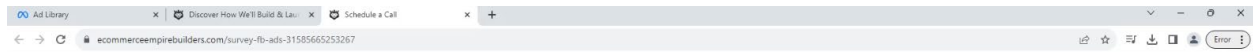
We believe so highly in our services and what we do that we want to ensure that you, as the client, feel protected with your purchase.

Our Business Buyback policy is that if you do not make 100% of your purchase price back within 18 months of your business opening, we offer to purchase your business back.

Click Here To Apply & Book Your Call

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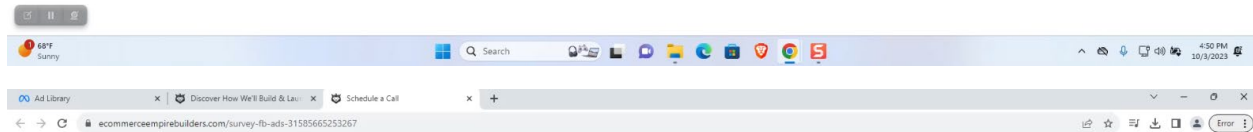
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What Is Your Full Name?*

First Name Last Name

NEXT →



What Is Your Best Email Address?*

example@example.com

← PREVIOUS NEXT →



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Why is NOW the right time for you to do this? (What happened in your life or business that makes it urgent for you to get help from us NOW?)*

I

Tr B I U

← PREVIOUS NEXT →

3 of 9

68°F Sunny

Search

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ecommerceempirebuilders.com/survey-fb-ads-31585665253267

If you joined us, what outcome would make you happy? (Please give specifics)*

I

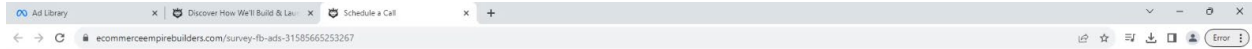
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← PREVIOUS NEXT →

4 of 9

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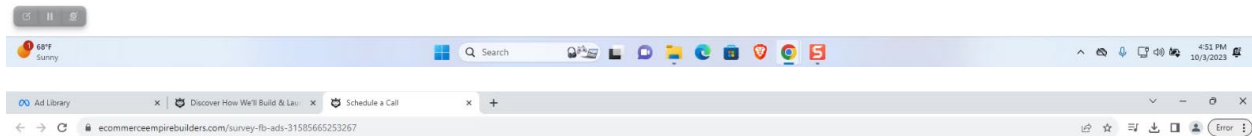
Search



What is your current job or profession?

← PREVIOUS NEXT →

5 of 9



How much are you able to invest in order for us to build & launch your AI-Powered Ecommerce business for you? *

☐ More than \$20,000 ☐ \$10,000 - \$20,000

☐ \$5,000 - \$10,000 ☐ Less than \$5,000

← PREVIOUS NEXT →

6 of 9



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Do You Need/ Open to Financing?*

☐ Yes ☐ No

← PREVIOUS NEXT →

7 of 9

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When Are You Planning to Get Started?

☐ I'm Ready to Start NOW ☐ 1-2 Months From Now

☐ Just Exploring My Options

← PREVIOUS NEXT →

8 of 9

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If accepted you'll be routed to book a call on my personal calendar. This is an exclusive program and requires a financial investment. If you miss the call without giving us notice, your number will be blacklisted and you will not be able to re-apply at a later date. Do you understand? *

☐ Yes, Let's Do This!

← PREVIOUS SUBMIT

9 of 9

68°F Sunny

Search

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ecommerceempirebuilders.com/calendar-fb-ads?email=

Ecommerce Empire Builders PRIVATE APPLICATION

Congratulations You Qualified!

Schedule Your Complimentary Call Below

Please wait until the scheduling calendar fully loads and then select a date and time that works best for you. Our team will personally call you on the phone at your scheduled time so please make sure to be available.

Pick a date and time [Change selection](#)

Duration: 60 minutes
Your time zone: United States: Pacific time (GMT-7:00) (DST) (Change)

October 2023							Available starting times for Wed, Oct 4, 2023	
Sun	Mon	Tue	Wed	Thu	Fri	Sat	AM	PM
1	2	3	4	5	6	7	8:00 AM	12:00 PM
8	9	10	11	12	13	14	11:00 AM	1:00 PM
15	16	17	18	19	20	21		2:00 PM
22	23	24	25	26	27	28		
29	30	31						
< September							November >	

If you do not show up to your selected call time and waste our team's time, we won't allow you to reschedule so please be sure to pick a time that you KNOW you can be available.

68°F Sunny

Search

Attachment B

OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. 2423002

DATE RECORDED: OCTOBER 3, 2023
TRANSCRIBED: JANUARY 5, 2024

PAGES 1 THROUGH 65

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2423002 10/3/2023

1 FEDERAL TRADE COMMISSION

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4 RECORDING:

PAGE:

5 Ecommerce Empire Builders - Signup from

6 Facebook Ad (2023-10-03_17-13-56) 4

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1 FEDERAL TRADE COMMISSION

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7 October 3, 2023

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2423002 10/3/2023

1 P R O C E E D I N G S

2 - - - - -

3 ECOMMERCE EMPIRE BUILDERS - SIGNUP FROM FACEBOOK AD
4 (2023-10-03_17-13-56)

5 PETER PRU: -- how to claim your share of
6 this \$500 billion industry. Ever thought about owning
7 an e-commerce store but worried about the hours it
8 takes to manage it? Well, I found a company that will
9 build your store from scratch using proven funnels and
10 then run the store for you using their team of experts
11 and the power of AI.

12 Picture this. You invest and they handle
13 the rest, from product listings to customer relations,
14 even marketing and ads, it's all taken care of for
15 you. Basically, you're getting a secondary income
16 stream that's 90 percent hands-off. And with the
17 turmoil in the markets today, we all need a more
18 predictable source of cash flow.

19 Now, this does require an investment, as
20 most businesses do, but if this sounds like something
21 you'd like to learn more about, click the link below
22 this video and watch a free training that outlines
23 this process from start to finish. In five years,
24 you'll wish you watched this free training. Click on
25 the link below now and learn how owning an online

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1 business can provide the cash flow and freedom to
2 start living life on your own terms.

3 (Testimonial concludes and a new video is
4 selected.)

5 PETER PRU: Hey, thank you so much for your
6 interest in having the team here at the E-commerce
7 Empire Builders build and launch your e-commerce
8 empire in the next 30 days. My name is Peter Pru.
9 I'm the CEO of the E-commerce Empire Builders,
10 StoreFunnels.net, as well as Uncapped Supplement.

11 So I'm going to go over the shoulder right
12 now to really dive into exactly what our AI-powered e-
13 commerce store funnels that we're going to be actually
14 building out for you entails. It's important for you
15 to really understand what this process actually looks
16 like and what we're actually going to be doing for you
17 over these next 30 days before you click the button
18 down below to apply to see if you qualify for the team
19 here at the E-commerce Empire Builders to build and
20 launch your e-commerce empire.

21 So I'm going to go over the shoulder right
22 now and share my screen.

23 All right. So you should be seeing my
24 screen right now. So we're going to go over exactly
25 what our e-commerce platinum program entails and how

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1 exactly we are going to actually build you an AI-
2 powered e-commerce empire in the next 30 days. And,
3 yes, that means we're going to pick your products,
4 we're going to find your suppliers, we're going to
5 pick your niches, we're going to build your stores,
6 we're going to build your funnels and get sales within
7 30 days, and you are actually going to be covered by
8 our business buy-back program guarantee, which we'll
9 be going over here shortly.

10 And I don't want to bore you with a ton of
11 screenshots, though, but you can see Nata here is
12 somebody that we built and launched a business for,
13 and she did hit our \$10,000 per month club. Her
14 PayPal sales aren't showing here. And you can see
15 she's posting this in our group, and -- and all of
16 our, you know, clients here are congratulating her.

17 And that's what it's really about. We're
18 creating an environment of people that are succeeding
19 here, encouraging one another, and we're all building
20 our e-commerce empires together, okay? And we have a
21 ton of interviews and success stories from this. I'm
22 sure you've seen some of them already on our YouTube
23 channel, where we're interviewing our clients, and you
24 can see a bunch of them.

25 You can go on our YouTube channel and listen

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1 to what it is like working with us inside of our e-
2 commerce platinum program, where we build and launch
3 your business for you in the next 30 days, just like
4 we did for all the people that you're seeing on this
5 screen, and there's plenty more of these interviews on
6 our channel as well.

7 And, again, this doesn't matter if you've
8 never done e-commerce before or you've done e-commerce
9 before in the past and you've struggled. You can see,
10 you know, Tracy here getting amazing stats. She's
11 getting buyers for like \$1.60-70.

12 If you see on the screenshot here, Carlyne
13 here, after four days, made her first 250 -- over \$250
14 in sales. And Tricia here with her first sales ever
15 in e-commerce, and we have a ton of these screenshots
16 of people in our \$10,000-per-month club, \$50,000 per
17 month club.

18 You can see, you know, Phil here had almost
19 \$20,000 a month. Shannon here with -- you know,
20 there's such a great story I could tell of Shannon.
21 She came to one of our live events and actually had us
22 build and launch her business for her. And, you know,
23 not to go into all her personal life or anything like
24 that, but she needed this to work, and you can see
25 here with her revenue right here, and this was just in

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1 two weeks. It just absolutely took off, and she did
2 \$652,000, which is just absolutely insane in just the
3 four-month mark. And we built that business for her,
4 just absolutely amazing.

5 And she was, just like I said, she was
6 somebody that -- that came into our program, we built
7 that funnel for her in two weeks. We kind of made --
8 really got it done really quickly for her and just to
9 see those amazing results that she got, it's just --
10 she was so deserving. It was just such an amazing --
11 such an amazing email that we got from her, as you can
12 see here.

13 And we even list out all of our success
14 stories. I can't even fit them all on this page,
15 but we have a running list, live list, so if you ever
16 want to see all of our seven-figure club award
17 winners, our \$50,000-per-month award winners and
18 \$10,000-per-month winners, you can head over to
19 EcommerceEmpireBuilders.com and you can see all of
20 them. We list them all out there. These are real
21 people, just like me and you, where -- you know, and
22 I love doing our live events as well, you know, where
23 we get to hand out our awards to -- to -- to people
24 just like you, you know, building our e-commerce
25 empires.

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1 And, again, just some more testimonials here
2 from Javier, \$50,000. He's already in our seven-
3 figure club. Shannon who you just heard of, also in
4 our seven-figure club; and Anthony, as well, is in our
5 seven-figure club.

6 So you might be wondering who are we. If
7 you haven't been, you know, a follower of our, you
8 know, E-commerce Empire Builders YouTube channel or
9 podcast, you know, we started in 2015 where our first
10 YouTube video was uploaded and actually started as a
11 passion project of mine because I was in a mastermind
12 group, and everybody was wondering and was, like, how
13 -- Pete, how are you building your e-commerce business
14 using these funnels, using these strategies? They'd
15 never heard of this stuff before because our -- our
16 process is so unique. And if you watch some of our
17 content, you understand that, you know, our process is
18 very different, and it is very unique.

19 So I was just looking for a place to upload
20 some tutorial videos to help some of my mastermind
21 friends out, and, you know, it really blossomed from
22 there. People started asking, hey, can you help me
23 with this, can you do this for me, and now, in 2020,
24 we've had over two -- 2,000 -- helped over 2,000
25 business owners. And by 2023, now we have over 30

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1 experts around the world helping not just build our
2 own businesses to that eight-figure level but helping
3 our clients succeed as well.

4 So here is, you know -- you know, obviously,
5 me being the CEO, obviously best-selling author of E-
6 commerce Empire, if you guys have read it. I do a lot
7 of public speaking and, of course, if you know, my
8 first seven-figure e-commerce business was in the
9 fishing niche. I absolutely love fishing, but then
10 you might not know Ali. He's on our channel as well.
11 He's our chief operating officer, our COO, and he is
12 an absolute genius when it comes to design, experts,
13 funnel creations, offer creation, and you'll be
14 hearing obviously a lot from him as well on our back-
15 end here inside of our e-commerce platinum program.

16 And the thing about us, guys, is that we
17 don't just, you know, teach this stuff; we don't just
18 do this stuff; we -- we have a lot of different
19 businesses as well that we are successful in.
20 Obviously, we have our -- you know, our E-commerce
21 Empire Builders, which is this agency where we build
22 and launch e-commerce businesses, we manage
23 advertisements for our clients, we manage social media
24 accounts. We have a full suite of services, including
25 our book as well.

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1 We also have a software company called
2 StoreFunnels.net. We have the supplement company
3 called OnTapFocus.net, and all of our stuff has
4 been featured in a wide range of publications, like
5 Forbes, Entrepreneur, BuzzFeed, ClickFunnels, even Tai
6 Lopez -- love him or hate him, but this was a very fun
7 moment for me many years ago, and he flew me out to
8 his mansion to -- to show him these unique strategies
9 that we'll be doing here for you as well.

10 And here's a picture. I -- you know, I
11 always love to share some of the pictures from our
12 live events and stuff because it's just a great way to
13 -- to meet each other, network with one another, and
14 just a totally different learning environment. So,
15 so, so fun.

16 So who is our e-commerce platinum program
17 for? Well, number one, this is for normal, everyday
18 people that work a nine-to-five job. You have more
19 money than time, and you want to start that journey to
20 making money online. This is also for those of you
21 that are existing e-commerce business owners that are
22 working way too hard and not making enough money.
23 Trust me, I know that feeling where it's like, hey,
24 I'm getting more customers, I'm getting sales, but,
25 like, when am I going to get some money out of this?

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1 Like, when am I going to be able to actually pull some
2 money out of this?

3 You're going to see in this short
4 presentation why you're never going to be able to pay
5 yourself from your e-commerce business and, more
6 importantly, what you can do to actually start being
7 able to pay yourself from your e-commerce business
8 because it's -- it is -- you know, it's a different
9 mindset shift, as you're going to see.

10 This is also for those of you struggling
11 with getting an e-commerce business off the ground and
12 making that predictable money. There's a lot that
13 goes into launching a successful e-commerce business.
14 Guys, we have a huge team that we launch businesses --
15 one or two new e-commerce businesses each and every
16 single day, not just for our clients, but for
17 ourselves as well, and we manage hundreds of clients,
18 ad accounts, products.

19 We know what works. We have so much data on
20 winning niches, winning products that we pretty much
21 know before we even start what's going to work and
22 what's not going to work. And that's the kind of
23 service that you are going to be getting inside of our
24 e-commerce platinum program if we do decide that it is
25 a good fit for us to work together.

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1 And this is especially for those of you that
2 feel overwhelmed or you've tried an online course or
3 an online business and you've gotten absolutely no
4 results. Trust me, I know how it feels. You go
5 through online courses, you feel overwhelmed, and you
6 don't do anything with it, and that's part of the
7 reason we don't really sell courses or online courses
8 or programs because we understand that to really be
9 successful in this game, you really need a team by
10 your side.

11 And I'm just being honest here with you
12 because it's very difficult out there to go out there
13 and just build everything on your own, manage
14 everything on your own. It -- there's a lot of tasks
15 to really create a successful e-commerce business, and
16 you probably know that, how much goes into running a
17 successful e-commerce business. It's not like it was,
18 you know, 10 years ago and anybody could just throw on
19 a random store and make money. It's just not like
20 that. There's a lot more to it to be successful now.

21 And this is especially also for those of you
22 that want to really capitalize on artificial
23 intelligence, on AI, and really embrace it. You know,
24 this is a new technology that is really coming down --
25 really down the line right now that we have embraced

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1 fully inside of our companies and using it absolutely
2 everywhere because AI is like the internet when it
3 first came out.

4 You really need to learn about this, and
5 we're going to be bringing you up to speed on exactly
6 how we're using AI and e-commerce and really becoming
7 the leaders in AI and e-commerce. We have two full-
8 time people just at the E-commerce Empire Builders
9 that -- that just focus on AI, and that's the kind of
10 access that you're going to be getting inside of our
11 e-commerce platinum program, okay?

12 So a quick earnings disclaimer, as this is
13 obviously not a get-rich-quick scheme. We're going to
14 build this entire business for you, but you still must
15 do your part. At the end of the day, this is your
16 business that we're building. We're going to be there
17 for you each and every single day to help you build
18 and grow this business absolutely, but if you decide
19 you don't want to show up anymore, we are not going to
20 chase you around. We can't want you to be successful
21 more than you want yourself to be successful.

22 But that's two tenets that we have here at
23 the E-commerce Empire Builders. Number one, we're
24 going to treat your business like it is our own. We
25 will always do that. We will always treat your

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1 business like it is our own. And, number two, we will
2 show up for you each and every single day. You will
3 see the level of service that we offer for our
4 clients, being there for you, right, of course, in the
5 good times when you're making sales, but also in the
6 times where, hey, we need to make adjustments, right?
7 Maybe we need to tweak ads; maybe we need to tweak
8 products, right, because that's the name of the game.
9 That's how business works. And I always like being
10 up-front and honest about it, okay?

11 So, number one, I need you to understand,
12 Shopify Storefronts, Amazon, if you're considering
13 those kind of things, they do not work. Don't let
14 anybody tell you. I'm going to prove it to you right
15 now in a short few minutes why these kind of programs
16 or schemes on Amazon, Amazon automation, Walmart
17 automation are just absolute nonsense and you are
18 literally going to waste your money, especially if
19 you're even considering Shopify or Recommerce or any
20 of these platforms.

21 Number one, this is what they're building
22 you. They're building you a random website filled --
23 preloaded with a ton of random products in it, okay?
24 Now, here's the problem with that, right? The site
25 might look cool: oh, I got a bunch of products; I'm

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1 in business. But here's the issue. You might have a
2 page like this or that you send your customers to.
3 They have no idea where to click, what to buy, what to
4 do. We need to be -- they need to -- we need to be
5 telling them exactly what they need to be doing. But
6 for the sake of this example, let's say you have this
7 store. Hopefully, a customer comes in and clicks on
8 some "add to cart" button. Okay, they click "add to
9 cart," you know, they click the product page, then
10 they have to click "add to cart," so they're clicking
11 already three times, right, hoping that they click
12 "add to cart" on this fishing lure right here.

13 Then they have to go to the checkout page;
14 they got to click checkout again here. Finally, they
15 have to go to the actual checkout page where they fill
16 out their personal information, and you can see that
17 there is a lot of disconnect here, right? There's a
18 lot of clicking that's happening, and this is called a
19 funnel, right?

20 Now, it's not a good funnel by any means
21 because they have to click around 20 times before they
22 even give you any sort of money, but you can see
23 there's -- each one of these clicks is a spot that you
24 lose your customer. So here's the actual better -- or
25 really the what happens here, right, and in terms of

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1 money, okay?

2 So number one, we're selling that fishing
3 lure in that store for 9.97, okay? They come in; they
4 purchased. All right, fantastic, right? They
5 actually went through all the clicks and purchased it
6 for 9.97, but we have product costs, obviously.
7 That's a \$3 product cost, right? There's a shipping
8 cost in there as well. Let's average that for around
9 \$2 for a product like that. So we're left with \$4.97
10 in profit, right? Awesome. Fantastic. We're
11 profitable, right?

12 Eh, not really, okay? What about acquiring
13 the customer? And this is the most expensive part of
14 this business. The most expensive part of this
15 business is acquiring customers. Don't let anybody
16 tell you anything else. That -- in e-commerce, the
17 most expensive -- the highest expense in your business
18 will be your advertising.

19 Let's say you get this person for \$5, right?
20 You are able to run ads on Facebook or whatever,
21 TikTok, right, and you get somebody for \$5 to purchase
22 from you, right? You're paying \$5 to the ad platform,
23 which is very low already. It's probably going to be
24 more than that, but check out what that does to the
25 numbers, right? 4.97 that you thought in -- in

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1 profit, minus your \$5, you lost three cents. You lost
2 money, right? You lost money, okay?

3 So let's look at why you -- now you need a
4 sales funnel, okay? And a sales funnel looks
5 something like this. We drive traffic to a page like
6 this, where we highlight one specific product. We're
7 not showing them a million products, because a person
8 that has given a ton of different options, guess what,
9 they don't buy. A confused mind does not buy. There
10 is a reason, right? And, you know, I challenge you,
11 next time you go to the restaurant -- to a restaurant,
12 right, look at the menu. There's always going to be,
13 like, stars or best-sellers or choices, right, between
14 like four or five items in the entire, you know, list
15 of 100 items at this restaurant.

16 What do you think is being purchased the
17 most? Those, the ones that are saying, hey, like,
18 best-seller, best-seller, right? That's what we are
19 essentially doing but doing it online, right? But --
20 so, here, we're highlighting our best product, right?
21 We're selling them on why they need to buy this. And,
22 now, as you can see, we're asking them for their email
23 address. Why are we doing that? Because we want to
24 create assets for our company.

25 If you ever want to sell your company, your

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1 competitor who's -- or whoever is buying you, the
2 equity company or whatever, they're not buying your
3 technology; they're not buying your product. Trust
4 me, they have the money to go develop that product,
5 right? They're buying your assets.

6 Think about when Facebook bought Instagram.
7 You don't think Facebook -- Facebook -- can create an
8 Instagram? Of course, they can, but why did they buy
9 Instagram for a billion dollars or however much it
10 was? Because of the customers, business of the assets
11 that were created already on Instagram, okay?

12 So, here, we're now creating an asset.
13 We're grabbing that email address. This person we can
14 follow up with emails, text messages, to bring them
15 back to buy, but after they enter their email address,
16 right, now they can buy, right? Now, here, we have a
17 -- we're doing a bunch of fancy things. We're doing
18 quantity break discounts, we're doing order bumps, we
19 not going to get into all of that, but the purpose of
20 what we're doing here is increasing the average cart
21 value. We're increasing how much money somebody
22 spends with us. This is critical. You cannot just
23 rely on one-time purchases from your customers. You
24 need to increase that average cart value so you can
25 spend more money to acquire customers. Absolutely

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1 critical.

2 So we -- we give them quantity break
3 discounts -- one, two, four, six, eight right here;
4 then we give them up-sell pages. Oh, by the way, did
5 you notice something? Within three clicks, I've
6 gotten their money. Within three clicks, I've already
7 gotten somebody's money. When compared to the Shopify
8 or Storefront on the previous example, how many clicks
9 before -- it was like 10 clicks before we even got
10 their credit card information. Here, within two
11 clicks, right, within three clicks, actually, we're --
12 they're already checking out.

13 And, now, here are the up-sells. Again, up-
14 sells here are designed to increase average cart
15 value, to increase how much money somebody spends,
16 right? One of the biggest reasons all the Shopify
17 sellers and e-commerce sellers fail is because they do
18 cart pages. A cart page is terrible, right? If
19 you've ever done a Shopify store, you probably see why
20 do I have so many people coming in here, they add all
21 this stuff to their cart, but then they don't buy?

22 You know why they don't buy? I'm going to
23 tell you right now. It's called buyer's remorse, and
24 you've probably done it yourself, right? You've gone,
25 you went on a website, you browsed around, you're

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1 adding everything to cart, then you go to your
2 checkout page, you look, oh, that's a scary number.
3 Maybe later I'll come by -- get back and buy this, and
4 then you never come back.

5 It's -- it's bad, right? That's why
6 conversion rates on Shopify are under 1 percent on
7 average. That's released by Shopify. Under one
8 person out of 100 will buy from you. You can look
9 that information up. All right? And, here, this is
10 all one-click. There are no cart pages in funnels.
11 When they click yes here, they get automatically
12 billed, automatically. And here's the -- the magic,
13 right, we always add in some sort of monthly
14 subscription offering, right? This is critical,
15 right?

16 You don't want to start the month at zero
17 dollars. It is a terrible, terrible idea, right? You
18 want to have some sort of predictable money coming
19 into your business each and every single month. So
20 for here, for this example, it's a monthly fishing
21 subscription box that they get each and every single
22 month, okay, and then our thank-you page, okay?

23 Now, let's look at these -- what these
24 numbers actually look like, right? Let's say they
25 come in, right, and they only bought that one fishing

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1 lure again, right? Most of the time, they're not.
2 That's why we do the quantity break discounts, but for
3 the sake of this example, let's say they just bought
4 something, 9.97, same exact fishing lure.

5 But let's say they bought that order bump,
6 right? That's an extra \$12.97, right? And let's say
7 they did purchase that up-sell product, right? That's
8 \$24.97 per month now, right, for a total revenue
9 generated, \$47.91. Okay? Now, let's say each of
10 those product's cost is about \$3; total product cost
11 is being \$9 for -- to fulfill on all those products.
12 Shipping cost stays the same because we're using the
13 same supplier, so we're not getting charged for extra
14 shipping. \$2, right? So we are now left with \$36.91
15 of profit. And you might be thinking, well, what
16 about acquiring that customer when we're paying the
17 same that we did before. We're just sending them to a
18 better page designed to make us more money. So it's
19 still going to be five bucks.

20 Now take a look at this. \$36.91 in profit,
21 minus the \$5 in ad cost. We're left with \$31.91. We
22 made money, plus -- plus -- we're going to make money
23 every month for free because of that monthly
24 subscription offering that we have in there, that we
25 have baked in there. Okay, absolutely critical.

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1 Now, you might be thinking, well, Pete, not
2 everybody's going to come in here and buy, you know,
3 one and buy the order bump and to buy the -- you --
4 number one, of course, you're right. Would you be
5 shocked that my numbers are actually low right here,
6 right? I wanted to show you what realistic numbers
7 look -- not even realistic numbers. So, like, these
8 are already on the lower end when you're using a
9 properly designed and optimized sales funnel, okay?

10 Here's the magic. We use the same traffic.
11 We use the same product. We just changed how we sold
12 it. That's all we did. We just changed how we sold
13 it. We changed the pages. We optimize for conversion
14 and monetization, instead of just making you a pretty
15 site loaded with thousands of products. But guess
16 what that did, right? We increased revenue by 42,932
17 percent. There is not many things in life that you
18 get that kind of return.

19 All right, and here's where the numbers get
20 staggering, right? That one customer in Shopify, we
21 lost three cents. One customer in the funnel, we made
22 \$31.91. Let's blow it up a little bit. A hundred
23 customers in Shopify, you lost \$3. A hundred
24 customers in the funnel, you made \$3,000 -- or over
25 \$3,000.

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1 Let's do that over 1,000 customers, right?
2 You lost \$30 in Shopify. A thousand customers in the
3 funnel, thirty -- over \$31,000, close to \$32,000.
4 Right? And these numbers only keep compounding. Now,
5 you might not -- you'd be, like, Pete, well, then, you
6 know, why is not everybody talking about this? Why
7 are you the only one on here talking about this crazy
8 strategy?

9 Here's the thing. You might just not be
10 looking, because guess who agrees with me? Shopify
11 themselves. Literally Shopify themselves. Look at
12 this article they released. Why every -- this is a
13 Shopify-released article. They said why every Shopify
14 store needs a marketing and sales funnel, right?

15 Look at this. The key to any successful
16 business is a healthy sales funnel. This is
17 especially true for e-commerce stores whose survival
18 relies on transforming their site from visitor --
19 their site visitors from casual browsers into
20 committed customers. See, they even know. They even
21 know that they need a funnel. They even know that in
22 order to be successful in e-commerce, you need a
23 funnel, but their platform, you can't even build
24 funnels on top of, right? And the apps that you need
25 to actually build the funnel on Shopify, they will

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1 cost you close to \$500 per month. It's not even all
2 baked in under the same platform, okay? It's
3 absolutely ridiculous, guys. Absolutely ridiculous,
4 okay?

5 Now, you might be thinking, hey, what about
6 Amazon? I could just use Amazon. Guys, you know,
7 Amazon, you know, I actually got my start -- one of my
8 first successful businesses was actually an Amazon --
9 Amazon niche. So I'm going to tell you a quick, quick
10 story because I do want to value -- value your time
11 here.

12 But I had an Amazon business, was doing
13 close to \$80,000 per month. And guess what, a
14 competitor came on my listing, and they clicked that
15 little button, and they said, hey, he's -- he's
16 infringing on my patents. There was no patents. But
17 guess what, Amazon doesn't care. They shut my
18 listings down because they don't want to get involved
19 in legal battles. That is not their job. They don't
20 get involved in legal battles, okay? And you can see
21 that it took over -- I know that you could see, but,
22 you know, it took us over a year to get my Amazon
23 account back, and that damage was already down.

24 Next, who do you think -- you know, why do
25 you think Amazon keeps launching so many AmazonBasics

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1 products? And how do you think they know what
2 AmazonBasics products to launch? From sellers, that's
3 who. They have the data. And let me guess, right? I
4 had a -- let me tell you a -- another quick story.

5 I had a friend. He was selling packing
6 cubes, right, like that you travel and organize your
7 suitcase with. And guess what, Amazon launched their
8 own version of the packing cubes because they saw he
9 was making millions of dollars per month, and he was
10 ranked number one when you search packing cubes on
11 Amazon. And guess what, Amazon launched theirs.
12 Guess who ranks first.

13 Guess who ranks first. Do you think Amazon
14 is going to rank my friend first, or do you think
15 they're going to launch their -- push their product
16 more? I think you get what -- the point I'm trying to
17 make.

18 Amazon is a business. They don't care about
19 if there's third-party sellers. They're using their
20 third-party sellers to test and validate data, which
21 then they go and use to launch their own products.
22 Now, I'm not saying don't -- we're -- you know, not to
23 go sell your products on Amazon. We sell products on
24 Amazon. But we mainly put -- bring all of our money
25 in through our own funnels through our marketing so we

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1 control the customers.

2 We build our own e-commerce empires. We're
3 not helping Amazon continue to build their Amazon
4 empire, okay, because Amazon's customers are Amazon's
5 customers. They are not your customers, and a lot of
6 people that sell on Amazon think that they have a
7 business. That is not your business, you are just
8 helping Amazon build their business, right?

9 And all these Amazon automation schemes,
10 number one, right, you could -- you know, we're not
11 going to talk about this a lot, but you could go
12 research it, the FTC is coming down very hard on a lot
13 of these schemes, so I do recommend you please go do
14 your research, okay?

15 And you can see even the Wall Street Journal
16 released an article: Amazon.com has adjusted its
17 product-search system to prominently feature listings
18 that are more profitable for the company, said people
19 who worked on the project, right? That, like, of
20 course they do. It's a business. If you owned
21 Amazon, you'd do the same thing, all right?

22 And the best part about our model is we do
23 use the drop-shipping model, where you don't store or
24 ship any of that product, right? The supplier handles
25 all the logistics for you. Your job is simply to sell

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1 stuff through the funnels, right, and then the
2 supplier automatically ships it to your customers,
3 right? And e-commerce is set to be a \$7.3 trillion
4 industry, guys, by the year, like 2025, right? Like,
5 absolutely insane.

6 I mean, this is the best opportunity if
7 you're looking to make money online, is to get into e-
8 commerce. I mean, come on, guys, when's the last time
9 you went to the -- to a store to buy something, right?
10 You're either going to buy it online, right? Of
11 course you are, right? And e-commerce is truly
12 continuing to boom, especially with the events that
13 happen in these past few years. It's continuing to
14 boom tremendously.

15 So here's Niles, right? So I'm going to
16 quickly -- we're not going to read this whole thing.
17 I'm just going to highlight a point. "I signed up for
18 -- with Pete in early January for a done-for-you
19 program. I have wonderful support and help from his
20 whole team."

21 "Probably the best decision I made. Sales
22 will hit over 11,000 this month (five weeks since it
23 took over). Have also signed for additional funnels
24 and work with his team over the last two weeks." A
25 lot of our clients do end up buying additional funnels

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1 with us, guys, and a lot of our clients do end up
2 hiring us to continue to run their ads.

3 And you're all probably wondering, Pete, why
4 are you doing this? You know, what -- you know, what
5 -- why are you building these e-commerce businesses
6 for -- for other people? Why don't you just build
7 them all for yourself? Well, I'm going to answer that
8 question, too, before we -- before I show you how
9 Nilesh grew his -- how we grew his business from, you
10 know, \$1,000 a month to that \$11,000 per month mark in
11 five weeks.

12 Number one, we do run our own e-commerce
13 businesses. And, number two, we do selfishly want to
14 launch your e-commerce businesses. You know why?
15 Because when you are successful with them, you will
16 hire us for additional services. We have a lot of
17 different businesses that we run here, and we also
18 have our agency.

19 And our agency is where we work with clients
20 to run their advertising; we manage -- we manage their
21 funnels, right? We manage their graphics; we manage
22 their social media; we manage their email marketing.
23 We have a whole division in our company that's like
24 that. So my goal for you is to get you set up and
25 running with an e-commerce business, get you

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1 successful, right, and then you have enough money to
2 hire our team, because again, as I mentioned, you
3 can't go at this alone. You need a team by your side
4 that's helping you grow. So that is the reason that
5 we do this, okay?

6 So take a look with Nilesh here. First
7 month, you know, decent conversion rates, right, for a
8 first month. This was fantastic. You can see these
9 conversion rates in the -- in the middle column where
10 it says Sales. Decent conversion rate, 5.5 percent,
11 not bad, not -- not the best, but the up-sells were
12 absolutely kicking butt. You can see 8 percent, 5
13 percent, 5 percent, which they're doing absolutely
14 amazing. You'd see he was getting monthly subscribers
15 here as well through the funnel.

16 Here is on month number two. Conversion
17 rate stayed the same, so we were, like, okay, well, we
18 reverse-engineered the numbers, but here was the
19 issue, right? You can see on that OT03, that's his
20 up-sell three, one-time offer three, it's his Crystal
21 Club, that's his monthly subscription offering.

22 We're, like, uh, that's, like, low. That's,
23 like, really, really low, because our goal here is to
24 get monthly subscribers, guys, like you know that. We
25 want to get monthly subscribers in here to make your

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1 life easier, so you're not starting every single month
2 at zero. And he's making money here, which is
3 fantastic, but we're, like, hey, how can we get some
4 more monthly subscribers here.

5 And this is why, guys, I'm telling you you
6 need a team by your side that's done this hundreds
7 upon hundreds of times. I'm not selfishly telling you
8 that, right, but I'm telling you, like, even if you
9 want to go at it alone, like it's so difficult because
10 you don't know where to look because you feel
11 overwhelmed. Maybe you even -- you have still, like,
12 a full-time job, so it's like you have so many moving
13 pieces, but we were able to -- we diagnosed his
14 funnel.

15 We were like, we changed up some things,
16 and take a look at this, right? Look at this. His
17 third month, right, OTO Number 3, look what that --
18 look how many people he got that month: 21 monthly
19 subscribers, right? Twenty-one monthly subscribers he
20 got into his funnel, right, which is absolutely
21 fantastic. We even bumped up the conversion rate
22 to -- to close to over 6.6 percent right there on that
23 front end offer, right?

24 So let's see the numbers, you know, because
25 that's, I'm sure, what you want to see. Close to

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1 \$16,000 in total revenue, plus we got 25
2 subscriptions, which is giving us \$624 per month,
3 right, coming in automatically each and every single
4 month, and that continues to compound over and over
5 and over again. So it really is just -- it's magical
6 as it happens, right, because that -- just 100 monthly
7 subscribers, just 100 monthly subscribers, you might
8 not even think that's a lot, or you might think it's a
9 lot.

10 You know, it doesn't matter. At the end of
11 the day, you know what does matter? That 100 monthly
12 subscribers gets you close to \$30,000 extra per year
13 in your business. Now, that is a number that I like
14 to see and that continues to compound. And trust me,
15 100 monthly -- 100 monthly subscribers, as you see, in
16 just one month, we did 20, and that's on the low end,
17 honestly. And it continues to compound over itself,
18 which is absolutely amazing.

19 As far as profit margins, front-end sales,
20 we like to do 20 percent. Profit margins on the up-
21 sells and subscriptions, we're shooting around that 50
22 percent margin because that's where you really want to
23 make a bulk of your money, okay, on the back end.

24 And Einstein said it absolutely best:
25 "Compound interest is the eighth wonder of the world.

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1 He who understands it, earns it, and he who doesn't
2 pays it." And it's so, so true when it comes to this
3 subscription. And look at the companies that are
4 being sold for billions of dollars. Dollar Shave
5 Club, right, simple business, right? What do they do?
6 They ship -- shipped you a razor each and every single
7 month, and they sold for a billion dollars.

8 And you can see all the companies that are
9 moving towards the subscription model. Look at Disney
10 Plus, their whole catalog, right? Think about Disney,
11 guys. Like, normal people would have been like, wait,
12 that's a stupid move. Why would they do Disney when
13 they could just sell the DVDs or, you know, just buy
14 the one-time sales digitally on -- you know, on
15 Amazon, don't they make more money that way, when they
16 could just buy the movie for 20 bucks?

17 No, that's the thing, no. They make more
18 money when they're charging \$9, \$10, \$12 each and
19 every single month to millions upon millions of
20 people, right? And look at Bark Box, you know,
21 there's meal prep companies, there's arts and crafts
22 companies.

23 Literally, there's a subscription with
24 anything, and the magic of all of this -- and I -- and
25 I'm sure, I hope you're getting excited about this, is

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1 that I'm not even scratching the surface of the
2 developments that we've made in e-commerce by
3 sprinkling in the power of artificial intelligence,
4 that by sprinkling in the power of all these AI tools,
5 because all of the funnels that we build, all of the
6 funnels that we build are powered by AI, and we're
7 going to teach you all of that stuff so you understand
8 exactly what that is, because there's a lot that we
9 have developed over the years really to add in this
10 artificial intelligence to make your life easier,
11 right, especially with AI, right?

12 Your business is powered by artificial
13 intelligence to make your life easier, not to get
14 you -- make you feel scared about AI, no, it's about
15 early movers advantage, and this AI that is already
16 added into all of our store funnels already is going
17 to make your life easier. And what I mean by that,
18 you hire -- you don't have to hire as many people.
19 Your profit margins get better, right?

20 It's just -- it's absolutely amazing, right,
21 from writing your copyrighting, from your
22 advertisements to your emails to your blog posts, your
23 articles, your customer service, all these things,
24 right, that previously cost tens of thousands of
25 dollars a month to be able to hire is all

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1 automatically baked in. We built this into the
2 software, into your funnel that we are going to be
3 building, into your stores that we're going to be
4 building. All this is built -- built out, right?

5 Look -- let me -- you know, I heard this
6 quote recently. Actually, it's not even a quote; it's
7 some -- it was a conversation that I was having with
8 somebody that -- that works here at the D-commerce
9 Empire Builders. And they said, what if you started
10 to make money online in the early 2000s, right? Like,
11 people would have been, like, you're crazy, you're
12 wasting your time. There's -- there's nothing cool to
13 this, right?

14 This is an actual headline. This is an
15 actual headline: "Internet may be just a passing fad
16 as millions give up on it." I truly believe with
17 pretty much 100 percent certainty -- 99.9 percent
18 urgent -- you know, urgency, right, or certainty, that
19 AI is not going away, and we need to embrace this
20 right now. We all need to embrace AI into our lives,
21 into our businesses, especially if we want to stay on
22 the cutting edge.

23 And that's why we have hired -- there was
24 even an article written, and I think I'll have it here
25 shortly, because I've been putting so much money into

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1 AI and hiring people that I actually was featured in a
2 Fortune, and (inaudible) I didn't -- you know, a
3 writer reached out to me because they saw all the
4 stuff that we were doing and wanted some information
5 on how, you know, how we're using AI in e-commerce,
6 and I'll show you that here in a -- in a -- a bit, but
7 this sort of breakthrough that I'm talking to you
8 about right now is -- it really -- there's not many of
9 these that happened in our lives, guys.

10 I think we all wish we could go back when
11 the internet came out and been the first to invest --
12 invest in, you know, Bitcoin or the first to invest
13 in Google. I truly believe we are so early right
14 now, right, that -- that really there's only a few
15 more opportunities like this that I'm going to see
16 in my lifetime, that's for sure, and we're lucky that
17 we've seen, you know, so many, like, you know,
18 cryptocurrency or internet, but I truly believe this
19 AI stuff, we all need to lean into this. We need to
20 lean into AI, guys, because this is such an
21 opportunity that we have.

22 And I don't want you to feel overwhelmed
23 here, right? We're going to bring you up to speed on
24 exactly what our developments have been in AI, and
25 this is what the Fortune featured me, where they

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1 wanted a quote from me because I've hired multiple AI
2 people into my companies that you'll have access to as
3 well, that we're paying six figures for, right? And
4 all they do is talk about -- all we do is AI, right,
5 how we -- how we can really make e-commerce as
6 powerful as possible, right, with the power of AI,
7 right?

8 So here's amazing words from Eric. He's,
9 again, one of our clients. He's, like, "The only
10 thing that doesn't change is the fact that everything
11 changes. E-commerce is a place for people who dare to
12 compete on constantly changing landscape." And that
13 is so, so, so true, right? And he talks about it
14 here, and you can pause the video and read through it,
15 but you can see he mentions, hey, there's been a lot
16 of fake gurus, they promise, they over-promise, under-
17 deliver, and that is not what you get here, guys.

18 That is not what you get here at the E-
19 commerce Empire Builders because it's not just about
20 me, right? It's not just about me. The same team
21 that helps me build my eight-figure companies is the
22 same team that's helping you build yours, and I would
23 be selfish not to thank each and every single one of
24 the people here that helped me build my business,
25 helped me build your businesses each and every single

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1 day because it's not just me.

2 We have a huge team here, over 30 people
3 that you have access to that are there helping you
4 build your e-commerce empire, right, just like they
5 did for Frederick who did 710 bucks in his first 12
6 days; Justin in his first -- I think this was his
7 first week, did 400 bucks in his first week. Now,
8 these aren't massive numbers, but this is people that
9 are -- never have ran an e-commerce business,
10 absolutely ever.

11 Right here is U Ee. She did over 200 bucks
12 on her first day; Bradley with his first -- you know,
13 first \$50 ever in e-commerce. You know, here's, you
14 know -- oh, I missed the screenshot, but he's doing
15 over, you know, \$250 a day, some days over 300. You
16 know, Jason here over 1,000 bucks this -- this month.

17 And I'm showing you guys this because this
18 is a program for those of you that are just getting
19 into e-commerce and those of you that obviously want
20 to scale your existing e-commerce business as well, we
21 can help you with, and we have a huge page of these --
22 of these testimonials or interviews of people that hit
23 our 10,000-a-month club.

24 But, again, I don't want you to feel like,
25 oh, that's a overwhelming number for me. We have

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1 people that are just getting into it making their
2 first sales in e-commerce as well, but I want you to
3 know that the e-Commerce Empire Builders are here to
4 help you grow not just to make your first sales but to
5 help you grow to \$10,000 a month, 50,000 a month, and
6 get you even to our seven-figure club as well. And
7 this is just one of our living documents that we have
8 that we share all of our, you know, clients with.

9 I mean, this page, it just continues to go
10 and go and go and go and go, but I don't want to bore
11 you with the screenshots. I want to tell you about
12 what your membership here includes.

13 Number one, you're going to get our E-
14 commerce Empire Academy. This is our seven-week, in-
15 depth training program designed to accelerate your
16 knowledge. You might be wondering, Pete, why do I
17 need to go through this. Well, in my opinion, I think
18 it's important for you to understand what we're doing
19 here for you, right?

20 At the end of the day, you're the CEO, and I
21 need to train you up to really -- make you understand
22 what we're doing here on the back end in the next 30
23 days. So that's what you're going to be doing over
24 the first 30 days, is you're going to spend some time
25 going through our academy. We also have weekly live

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1 coaching calls with us three times per week that you
2 can jump on. You have on-demand support with us.
3 You're going to be part of our exclusive group where
4 you have access to my entire team, basically at your
5 fingertips. You need something, ask it, we're going
6 to get it for you.

7 That's where you're going to be
8 communicating with me and my team pretty much 24/7,
9 and obviously you're getting our store funnel entirely
10 built for you, okay? And you're going to have our
11 inner circle access as well, and that's all of our,
12 you know, more higher level trainings that you'll --
13 you'll -- you'll eventually grow into, our higher
14 level Q&A sessions, and more mastermind-style.

15 Obviously, you're getting our full store
16 funnel built as well. Here's a rough layout on the
17 timeline. Day one through five, we're going to have
18 our introduction and kickoff call. Day five through
19 seven, you're going to -- we're going to start
20 building out the offer, right? That's the -- the
21 compelling reason people are going to buy from you
22 instead of going to Amazon or Walmart.

23 Day seven is going to be our strategy and
24 progress calls, and we can have as many of these
25 progress calls as you want. You can always just hit

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1 us up and be like, hey, where are we at things, you
2 know, we're there, but, you know, we're always going
3 to be -- we're always working towards, you know,
4 getting to your launch day.

5 Day 14 through 19, this is where we do copy
6 research and start developing the funnel. Day 19
7 through 22, we start doing the copy and the graphics.
8 Day 22 through 25, this is where we go into the
9 advertisements, graphics, copyrighting.

10 Day 25 through 28, we start running your
11 email sequences and developing the automations on the
12 back-end. And then on Day 28 through 30, that's where
13 we're getting that launch. And we like to have a
14 launch together with you on a call so you have a link,
15 we'll be able to schedule the launch call and get your
16 funnel launched.

17 You also have on here on the right-hand
18 side, you'll see three times per week, you're going to
19 get direct access to our inner circle coaches. These
20 are live calls that you can be part of. Again, you
21 always have access to us 24/7, but we do like to have
22 these mastermind calls three days a week. That way,
23 you can, you know, be there in more of a live
24 environment with us. Totally optional, but you're
25 going to have access to -- like I said, you'll always

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1 have access to us 24/7. Okay?

2 And, then, obviously, again, I mentioned the
3 calls. You have the instant over-the-shoulder support.
4 If we need to change some stuff up, not a big deal.
5 We change it. You get all of our, you know, private
6 training vault. You basically have access to all of
7 our programs, and you get our eight-figure case study.
8 So anything that we're working on, guys, and like I
9 mentioned, we have a lot of companies that we work
10 with, we manage hundreds of e-commerce stores, not
11 just our own, but our clients as well.

12 We have a lot of information, and who do you
13 think we're going to be sharing that information with?
14 You, because we want you to be successful with this,
15 because if you're successful with this, you will
16 continue to want to have our team help you continue to
17 grow it, right? Make sense? All right.

18 So E-commerce Empire Academy, again, you're
19 going to have access to that. That's -- you're going
20 to have the Elite Mastermind Group as well, plus all
21 the Q&As and recording -- I think you guys get the
22 idea. We give you pretty much everything you need to
23 be successful here, and especially during those first
24 30 days, we're really kind of, like, I hate to say the
25 word incubating, but really trying to teach you

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1 everything we know to bring you up to speed.

2 And, of course -- of course, of course --
3 we're going to be bringing you up to speed on how
4 these AI funnels and AI store funnels that we're
5 building for you how they work, how they're going to
6 make your life easier so you're staying on the cutting
7 edge.

8 And, yes, you are covered by our business
9 buyback program, okay? So we believe so highly in our
10 services and what we do that we want to ensure that
11 you, as our client, feel protected with your purchase
12 of our program. Our business buyback policy is that
13 if you do not make 100 percent of your purchase price
14 back within 18 months of your business opening, we
15 offer to purchase your business back from you.

16 So your next steps, because I'm sure you
17 have a bunch of questions right now, is click below.
18 There will be a green button. Click the button; fill
19 out the application in detail. I ask you, please give
20 me some details here, guys. We -- you know, we don't
21 work with everybody here, and I'm not just saying that
22 from a marketing perspective. I'm telling you we
23 can't work with everybody here, right? We don't have
24 that many resources to be able to launch hundreds upon
25 hundreds of these, okay? So I ask you, please give us

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1 as much details as possible in that application.

2 Now, it will -- that application will filter
3 you to see if you "qualifor" -- qualify or not for us
4 to actually do this, but if you do qualify for us to
5 actually do this for you in the next 30 days, build
6 and launch this to be a business for you in the next
7 30 days, it's going to ask you to schedule a call with
8 me and my team.

9 I do ask you, when you schedule this call,
10 please make sure that you write the date and time out
11 -- time out somewhere that you're going to remember
12 it. Post-It note, add it to your calendar, whatever
13 you have to do, right? This is important because, you
14 know, you know, I respect your time. I -- at the end
15 of the day, I want to respect your time, but I just
16 ask that you respect me and my team's time as well.

17 We're going to call you at that date and
18 time at the number that you've given us, whether it's
19 WhatsApp if you're overseas or your domestic number if
20 you're here in the States. All I ask is please, you
21 know, be in a quiet place. Don't be, like, running on
22 the treadmill or have a blasting TV. You know, be
23 somewhere quiet where you can take notes, because this
24 is a -- this is a session where, number one, you're
25 going to be able to answer -- you know, ask any

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1 questions that you have.

2 I'm sure you have a bunch of questions that
3 you might have been already writing down on a pad.
4 You're going to be able to ask that to our trusted
5 advisors, right?

6 And, number two, you want to make sure that
7 you're a good fit for us as well, right? We want to
8 create a win/win situation here for both of us, okay?
9 So all I ask you, click the button down below, fill
10 out the application in as much detail. If you do
11 qualify for a call, please pick a date and time that
12 actually works for you and you're going to be able to
13 be in a place that, you know, you're going to be able
14 to really have a good conversation with -- with me and
15 my team. So, again, I do ask you, just please respect
16 our time, and we will respect yours as well.

17 So I'm so excited about this. I'm so
18 excited to potentially build and launch your e-
19 commerce empire here in the next 30 days. Any
20 questions that you have whatsoever, please ask our
21 trusted advisors, but as always, how I end every
22 single podcast, every single YouTube video, your
23 empire starts now.

24 (Video continues without sound.)

25 PETE PRU: Hey, what's up, Empire Builder?

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1 First and foremost, thank you for booking your call.
2 You're obviously somebody that's interested in the
3 team here, building and launching your e-commerce
4 business in the next 30 days.

5 So thank you for booking that call, but
6 before we go into a few things that you really need to
7 know before we get on this call together, number one,
8 do me a big favor: write the date and time of your
9 call down right now. You are gonna get a few emails
10 as well as reminders of your call, but I do ask you if
11 you got like a sticky note on your desk or on your
12 calendar, put that date and time that you put in.
13 We're going to call you at the cell phone number or
14 phone number that you left us.

15 I ask for one thing, guys, just courtesy,
16 right? Just courtesy for me and my team. We're going
17 to call you at that time. And we do ask you to -- to
18 -- to really, you know, be able to take that call with
19 no distractions at all. Please don't, like, be
20 driving or watching Netflix. Give us the same
21 courtesy that we're going to give you, okay?

22 This call is to make sure that this is a
23 good fit for us to work together, right? Number one,
24 it gives you an opportunity to ask us a bunch of
25 questions to make sure that this is something you

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1 actually want to do. And this is a good opportunity
2 for us to ask you questions as well to make sure that
3 this is a win/win situation for us.

4 You see, we only want to work with people
5 that we know we can actually help, okay? So, again, I
6 just asked you, please, write the date and time of
7 your call down. Put it in your calendar, right? We
8 do not really offer reschedules, so we do ask that the
9 time you pick works for you. So, again, write it in
10 your calendar, write it on a Post-it note, and just
11 give us that courtesy. We're going to give you --
12 we're going to respect your time, and all we do is ask
13 you respect our time as well.

14 But I do ask you, watch this whole video.
15 We're going to go over some of the most common
16 questions that you probably have and that we've gotten
17 about how our e-commerce platinum program works,
18 right? How do these next 30 days work? And maybe
19 some other questions that you thought -- you might
20 have not even thought of that you really should know
21 the answers to.

22 So give me a few minutes right now, guys. I
23 ask you to watch this quick video. So I'm going to go
24 over these questions with you to make sure you are
25 prepared for our call coming up to build and launch

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1 your e-commerce business in the next 30 days.

2 So first and foremost, how long have we been
3 in business? Guys, we have been in business now for
4 about seven, eight years. You could go check on our
5 E-commerce Empire Builders YouTube channel, and you
6 can sort it by oldest videos, and you can see some of
7 the very first videos that we've ever launched. So
8 we've been in business for about seven, eight years.

9 Now, where are we located? We are located
10 really all around the United States, all around the
11 globe. Me personally, being the CEO of the E-commerce
12 Empire Builders, I'm located in Pennsylvania. Our
13 CEO, Ali, if you don't know, he's located in Dubai.
14 And it actually works great with our time zone
15 differences because I'm sleeping when he's awake, and
16 he's sleeping when I'm awake. But, then, also, we
17 have, you know, other, you know, contractors and
18 employees of ours that work all over the United
19 States, as well as in Europe and all around the world.

20 You might be thinking what kind of support
21 will you get. Guys, this is the best part about our
22 e-commerce platinum program. It's not only are we
23 doing all the heavy lifting for you, but we're
24 training you along the way, right? We want to make
25 sure you understand what we're actually doing for you,

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1 right? You probably want to understand what we're
2 doing for yourself, but in addition to that, you're
3 getting our top-tier service here where you have
4 access to me and my eight-figure team to help me build
5 my companies, right, 24/7. We use an app called
6 Basecamp. We can post messages. We can hop on calls
7 together, whatever, pretty much 24/7, okay? And
8 that's called -- we use our Basecamp app.

9 You also get three calls each and every
10 single week, group calls, with us each and every
11 single week. But, then, also, there's a bunch of one-
12 on-one calls that you have with us as well. Guys,
13 support-wise, we're here and there for you pretty much
14 each and every single day. We go above and beyond for
15 you.

16 Next question, would you get any of the
17 profits made with our store? Right now, we do not do
18 that, and the reason I don't do that, guys, is because
19 I was in a situation like this in the past where I was
20 working with an agency. I was taking profits of my
21 business, and it really spiraled our business out of
22 control, right? What you'll see is a lot of times
23 that they'll claim that they'll make profitable --
24 they'll make more profits in your business, but you're
25 paying for the advertising, you're taking all of the

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1 risk, literally every single piece of the risk.

2 So what we actually do, right, is where we
3 have a -- if you choose to continue to work with us
4 launching your business and actually just managing
5 your advertisements for you or managing your social
6 media, right, we have a very small retainer fee, but
7 you keep all of the profits of your business, all
8 right? And that is so, so critical, guys.

9 Don't work with people that take a
10 percentage of your ad spend because they're not
11 incentivized at that point. They're not incentivized
12 to make your business more profitable, right? They're
13 just taking a percentage of your ad spend.

14 That leads to the next question, right? How
15 do we actually make our money? Well, we make our
16 money because we want you to hire us for our different
17 kinds of services that we have. And I hate to be
18 blunt there, but I don't want to be like the rabbit --
19 pulling a rabbit out of the hat. You can go and
20 continue to run the advertisements for your business
21 for forever and ever and ever. Absolutely, we're
22 training you on all that so you know how to do it, but
23 we want you to hire us to be able to manage your
24 social media, manage your virtual assistants, managing
25 your advertisements, and our whole slew of services

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1 that we have here, okay?

2 And that leads me to this question, which is
3 what is the longevity of your customers. Guys, we
4 have a service that we call our automated ads
5 management. It's my favorite service. So many of our
6 clients go on to sign up for this, and the reason they
7 do is because not only do we manage your
8 advertisements, right, we manage where those
9 advertisements go.

10 And if you've ever talked to any of those
11 agencies or anything out there, they only do one of
12 those things. They'll just be, like, hey, I'll just
13 manage your ads, but they don't care where your ads
14 are going. And that's the key. You need to -- you
15 need -- your numbers of your funnel and your store
16 have to look good, right? Otherwise, anybody can just
17 go and run ads. Me, you, anyone can just go run ads.
18 It's what that traffic does, where does that traffic
19 go. And we actually manage that all for you.

20 To give you a perspective on our automated
21 ads management service that we have, guys, we have now
22 launched that about eight months ago, and we have not
23 had a single client cancel. We have not had a single
24 client cancel because they understand the value of
25 that service, and they understand the value of that.

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1 We now are responsible for some of the highest ROI
2 activities in your business.

3 Next question, do you offer financing? Yes,
4 we have a bunch of different kinds of financing
5 opportunities that you'll be able to take advantage
6 of. On the call that you have with our team, we will
7 go over all of those things if that's -- if that's
8 something you need.

9 How do you work with -- work with funding?
10 Soft check? Which banks? So, yes, all of that will
11 be covered on your call if you choose to go the
12 funding route. We have all of that set up. I do
13 believe they do soft checks with everything, and, yes,
14 you can do -- you can do funding. Just ask our team
15 member on your call, who will go over all of that with
16 you.

17 Once we have a store, who handles all of the
18 customer service and support of your actual customers?
19 Well, that is where we usually recommend hiring a
20 virtual assistant, which we can help you actually
21 train these virtual assistants. It can either come
22 from our team, right, or you can go and hire your own
23 virtual assistant and we'll help train them up. It's
24 about, like, \$5 an hour. They do it -- you know, they
25 log in once a day for an hour, answer your -- you

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1 know, fulfill your orders, answer your customer
2 service, emails, and any of those kind of, like, admin
3 tasks that you really don't need to be doing, okay?

4 If you choose to do them yourself, not a
5 problem. I -- you know, I do recommend doing the
6 first few yourself so you understand it for yourself,
7 but, again, we'll be able to assist you with all of
8 that as well.

9 Will I have to deal with customers if there
10 is a return? They're not going to necessarily return
11 to you. We have a very close relationship with the
12 suppliers that we use, so what ends up happening is if
13 there's a return for the customer, you'll get a refund
14 from your supplier anyway, if it's like a damaged
15 product or something like that.

16 Will you help me pick the products, and can
17 we change out the product? Absolutely, guys. If --
18 you know, if we launch the product, right, you know,
19 even though we've been doing this for -- for many,
20 many, many years and we have a ton of data and
21 launched thousands upon thousands of products, and
22 thousands of funnels, right, we have a lot of data,
23 but we still would never say 100 percent that this is
24 going to work. So that's what's amazing, that you
25 have the whole team here by your side, because if we

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1 launch the product and it's not getting sales, guess
2 what, we change the product, right? That's the way it
3 is.

4 You know, I have two kind of tenets at the
5 E-commerce Empire Builders that really I want you to
6 understand. It's number one, me and my team, we're
7 always going to treat your business like if it's our
8 own, all right? That is so critical, right? We will
9 always treat your business as if it is our own.

10 And number two, we will show up for you each
11 and every single day to help you continue to grow and
12 scale your business. So that means if the product
13 isn't working, we will change it out. And there is
14 not crazy additional fees or anything like that,
15 absolutely not. We are here to help you succeed,
16 because when you succeed, we succeed, okay?

17 Do we have to invest, pay for, a product,
18 buy inven- -- and buy inventory? Absolutely not.
19 That's why I hate the Amazon automation setup because
20 you're spending \$100,000 on inventory that you don't
21 know it's going to sell. Absolutely no up-front costs
22 on inventory. We work very closely with our drop-
23 shipping suppliers that send it directly to your
24 customer, literally no risk on your part.

25 Do we always change the product every month

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1 for the subscription offer? What if people get tired
2 of a product, is it part of your research to avoid
3 that? Absolutely. That is what you're hiring us for,
4 right, guys? So, you know, for example, for my
5 supplement business, it's an easier subscription,
6 right, because I can just send them supplements each
7 and every single month at a discount.

8 For you, maybe you're selling a fishing
9 subscription box or something like that, so they need
10 new fishing lures each and every single month, but
11 don't worry, that's what our research into the
12 supplier goes in to make sure that your subscription
13 box is fresh and that it keeps people on that monthly
14 subscription so you're making that money every single
15 month, right?

16 How would I get my products to the customer?
17 Our drop-shipping supplier will ship it out. Once an
18 order comes into your funnels, the drop-shipping
19 supplier will then ship that product to your customer,
20 okay? That means you're not storing products in your
21 house or at a fulfillment center. The drop -- the
22 supplier themselves does all of that.

23 Are products shipped from China, Alibaba?
24 Where do the products come from? So we have a wide
25 range of suppliers all over the world. Depending on,

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1 you know, our conversations that we have together, you
2 know, usually we'll find some -- we use DJ Drop
3 Shipping or USA Drop. We have a bunch of these
4 relationships. So, obviously, we always do our best
5 to find USA-based drop-shippers or warehouses within
6 the United States that have those. But, yes, that is
7 what we use.

8 How many products will I have? So if you
9 understand our basic funnel strategy, usually we have
10 a front-end offer, right? That's like a really
11 compelling product, like the fishing lure and some
12 bonuses that we've added in, making it really
13 compelling. And the reason we do this is you don't
14 want to just go with a store or a Shopify store and
15 load it with thousands of products because what are
16 you doing then? You're literally just competing with
17 Amazon and Walmarts of the world, and that is a
18 terrible, terrible place to be, okay?

19 What we do is highlight one specific offer,
20 showing the customer how this is going to help them
21 get whatever result, right? With the fishing lure,
22 how it's going to catch them more, bigger bass or
23 whatever, right? So that is the front-end offer.
24 Then we have our order bumps, up-sells and down-sells,
25 and then the monthly subscription.

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1 So throughout the funnel, there is about six
2 to eight products that are throughout the funnel,
3 okay, about six to eight products. And that's just
4 through one funnel.

5 Where will my website be built? We use a
6 software called StoreFunnels.net. It is the best --
7 absolute best website funnel and email marketing
8 builder on the market right now. What to -- what you
9 can do with StoreFunnels.net would cost you \$300 to
10 \$400 if you went to Shopify or you went to use, you
11 know, like a ClickFunnels or something like that.
12 Everything is built in StoreFunnels. Store building
13 like Shopify, funnels like ClickFunnels, and the email
14 marketing like Klaviyo or ActiveCampaign. It's all
15 built in there, right, and it's -- it's much cheaper.
16 It's like 70 bucks a month, right, which is absolutely
17 nothing compared to the value. And we've tested this
18 against Shopify and ClickFunnels. Our conversion
19 rates are always better using StoreFunnels.net, okay?

20 How long before products -- how long before
21 customers receive my products? This is variable,
22 guys. Obviously, we do our best to get the -- get the
23 product to customers within seven days, but we set up
24 different emails, if it's going to be a little bit
25 longer, letting them know and providing them

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1 additional value, you know, to kind of, you know, curb
2 that -- that anxiety of waiting for their package to
3 get in the mail.

4 What happens if our products run out or
5 saturate? Usually, we always go after, you know,
6 really evergreen products that aren't necessarily
7 going to, you know, go out of style. We don't -- you
8 know, even though product trends, there is value
9 there, it's not -- I wouldn't build my business on,
10 like -- on just one trending product, right? We like
11 to build more sustainable, evergreen products that
12 will sell for years and years and years to very
13 specific groups of people, which is the actual niches
14 that we'll be selecting for you, okay?

15 If a product runs out, we always have
16 different suppliers on standby. But, again, we're not
17 -- we're usually working very closely. We have very
18 good relationships with these suppliers, guys. We've
19 been working with them for years and years and years.
20 Rarely, rarely has this absolutely ever, ever
21 happened, okay?

22 Are the products low or high-ticket? It
23 depends on the niche, right? It depends on the nice
24 and depends on the strategy. You know, we've done a
25 lot of high-ticket stuff; we've done a lot of low-

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1 ticket stuff. It just depends on the strategy that we
2 come up with with you after we research your actual
3 niche, but usually a combination of both is what we
4 like to do, usually low-ticket on the first product to
5 kind of ease people into the funnel, and then on the
6 back end, up-sells and subscription, getting into the
7 higher ticket stuff.

8 When it comes to the products for my store,
9 who will be doing the negotiating. That's, again, all
10 us. That's what you're hiring us for. We're doing
11 all of that for you.

12 What if I follow everything you show me and
13 I do not get results. Guys, this has -- I can truly
14 tell you this has absolutely never happened. Again,
15 most of the people that sign up for our e-commerce
16 platinum program go on to hire us for our automated
17 ads management because they trust us, right, because
18 they trust us.

19 They want us to just manage the high --
20 highest ROI activities in their business so they can
21 focus on working on their business as the CEO of it,
22 okay? This has very rare -- like pretty much never
23 happened that if you follow all of our strategies, and
24 the reason it doesn't is because, guys, we will make
25 it work, okay? If the funnel stops performing, if the

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1 funnel isn't doing -- if it's not seeing the sales
2 that we thought, we will change your niche, we will
3 change your product, we'll change the up-sells, we'll
4 change the order bump.

5 That's -- we take to heart every single
6 client that we work with to help them hit their goals.
7 So if something isn't working the way it should, we
8 will change it to get it to work, okay? It doesn't --
9 and this -- it doesn't -- I don't care if it takes us
10 a year, two years, three years. We will continue to
11 make those adjustments, right, to make sure that it is
12 a working business that is generating sales and
13 getting you closer to the goals that you have set,
14 okay?

15 What credit card processors do you use? We
16 have a -- a very strong partnership with StoreFunnels
17 Payments that is by deposit, and the reason we do them
18 is because it saves you money. The processing fees
19 are way cheaper than if you had gone with, like, a
20 Stripe or a PayPal, but, again, we can do Stripe, we
21 can do PayPal. I do recommend going with StoreFunnels
22 Payments, and the reason for that is because you have
23 lower processing fees, right? You will save money.
24 Like, all about -- that's all -- that's -- you know,
25 what I want for you. I want more money in your

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1 pocket.

2 What's the turnaround time to get the store
3 launched? So it's going to be usually 30 days from
4 your kickoff call with us. That's where we're going
5 to decide your niche. Once we have the niche, we're
6 off to the races, and it's about 30 days at that
7 point.

8 Do we work hand-in-hand to know how to
9 adjust the marketing strategy? Yes. So during those
10 first 30 days where we're building your business for
11 you, you're going to be going through our E-commerce
12 Empire Academy program, so you're learning what we're
13 actually doing for you, plus you have that support
14 with us each and every single day, plus the three
15 weekly calls every single week. Okay?

16 So, yes, we're going to bring you up to
17 speed on exactly what we're doing, how to continue to
18 grow and scale your business, even if you choose not
19 to hire us later on down the line. We want to make
20 sure that you are prepared to build and grow this
21 business.

22 Can I do this if I'm new? Absolutely.
23 That's what it's for, to make sure e-commerce business
24 is built the right way, not with -- not going into,
25 like, a weird Shopify store that I know pretty much,

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1 99 percent of people that start a Shopify store end up
2 failing unless there's some big influencer with a
3 massive following already, 99 percent of people that
4 start a Shopify store because they have no strategy,
5 right?

6 They don't understand what funnels are.
7 They don't understand direct-response marketing. They
8 don't understand, like, anything besides just loading
9 Shopify stores with tons of products, and they think
10 because they're busy they're making progress in their
11 business. I mean, sorry, I will get off my high horse
12 there, but it just -- I just see so many people fail
13 at that that it just -- you know, it just -- it upsets
14 me that a lot of people waste their time and money on
15 it.

16 Do you offer a referral fee if I send people
17 your way after being a client? Yes, yes. We've had
18 this happen many times. So, yes, you will get a nice
19 little referral fee of 10 to 15 percent of your -- of
20 the package deal, so, yes, there are referral fees
21 that you get as well.

22 Where does the net profit go? Into your
23 bank account, right? It goes into your bank account
24 for you to pay yourself, for you to reinvest in your
25 business, for you to hire more people. That's where

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1 the fun begins, right?

2 How do you differ from other e-commerce
3 platforms? So, again, I mentioned this before with
4 StoreFunnels.net, guys. It is the -- the best
5 solution, but it's also the cheapest solution. That's
6 -- especially when you're starting new in a business,
7 I know that you don't want to risk a ton, right?

8 But when you go with a Shopify store or a
9 ClickFunnels, you are spending \$300-plus per month on
10 a business that's not even generating sales yet,
11 right? It is just absolutely terrible, and, again,
12 with StoreFunnels.net, you can build the stores, you
13 can build the funnels, you can do all the email
14 marketing, all in one clean, you know, UI, not piecing
15 together a whole bunch of apps to make it work.

16 And can I sell my store after building it if
17 I want to? Yes, we've had many clients go on and do
18 this, and we can help you with that process as well.

19 I -- that is all the questions, guys. I
20 hope you watched this whole entire video so you can
21 really understand what our e-commerce platinum program
22 is like and what that journey for you looks like.
23 Again, I do ask you, please just be courteous to us.
24 Write the date and time of your call down.

25 If there's any other additional questions

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1 that you have that we did not cover, you'll be able
2 to ask those to our team on your scheduled call. We
3 will call you at the -- at the number that you left
4 for us. And all I ask is that you please pick up the
5 phone. Again, we're going to respect your time. All
6 we ask is that you respect ours.

7 Guys, have a fantastic rest of your day.

8 And, remember, your empire starts now.

9 (The recording was concluded.)

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1 CERTIFICATE OF TRANSCRIPTIONIST

2

3

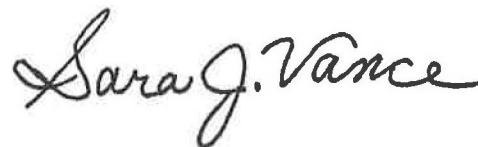
4 I, Sara J. Vance, do hereby certify that the
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9 this material; and that it has been transcribed to the
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11 the recording media.

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13 for, related to, nor employed by any of the parties to
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21 DATE: 1/11/2024



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SARA J. VANCE, CERT

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Attachment C

EMPIRE BUILDERS

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- Link Five

Terms And Conditions

Terms of Service

Date Effective: December 2022

General

This website (the "Site") is owned and operated by Empire Holdings Group ("COMPANY" "we" or "us"). By using the Site, you agree to be bound by these Terms of Service and to use the Site in accordance with these Terms of Service, our Privacy Policy, our Shipping Policy, our Return Policy and any additional terms and conditions that may apply to specific sections of the Site or to products and services available through the Site or from COMPANY. Accessing the Site, in any manner, whether automated or otherwise, constitutes use of the Site and your agreement to be bound by these Terms of Service.

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You acknowledge and agree that any contributions originally created by you for us shall be deemed a “work made for hire” when the work performed is within the scope of the definition of a work made for hire in Section 101 of the United States Copyright Law, as amended. As such, the copyrights in those works shall belong to COMPANY from their creation. Thus, COMPANY shall be deemed the author and exclusive owner thereof and shall have the right to exploit any or all of the results and proceeds in any and all media, now known or hereafter devised, throughout the universe, in perpetuity, in all languages, as COMPANY determines. In the event that any of the results and proceeds of your submissions hereunder are not deemed a “work made for hire” under Section 101 of the Copyright Act, as amended, you hereby, without additional compensation, irrevocably assign, convey and transfer to COMPANY all proprietary rights, including without limitation, all copyrights and trademarks throughout the universe, in perpetuity in every medium, whether now known or hereafter devised, to such material and any and all right, title and interest in and to all such proprietary rights in every medium, whether now known or hereafter devised, throughout the universe, in perpetuity. Any posted material which are reproductions of prior works by you shall be co-owned by us.

You acknowledge that COMPANY has the right but not the obligation to use and display any postings or contributions of any kind and that COMPANY may elect to cease the use and display of any such materials (or any portion thereof), at any time for any reason whatsoever.

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You agree at all times to defend, indemnify and hold harmless COMPANY its affiliates, their successors, transferees, assignees and licensees and their respective parent and subsidiary companies, agents, associates, officers, directors, shareholders and employees of each from and against any and all claims, causes of action, damages, liabilities, costs and expenses, including legal fees and expenses, arising out of or related to your breach of any obligation, warranty, representation or covenant set forth herein.

Online Commerce

Certain sections of the Site may allow you to purchase many different types of products and services online that are provided by third parties. We are not responsible for the quality, accuracy, timeliness, reliability or any other aspect of these products and services. If you make a purchase from a merchant on the Site or on a site linked to by the Site, the information obtained during your visit to that merchant's online store or site, and the information that you give as part of the

transaction, such as your credit card number and contact information, may be collected by both the merchant and us. A merchant may have privacy and data collection practices that are different from ours. We have no responsibility or liability for these independent policies. In addition, when you purchase products or services on or through the Site, you may be subject to additional terms and conditions that specifically apply to your purchase or use of such products or services. For more information regarding a merchant, its online store, its privacy policies, and/or any additional terms and conditions that may apply, visit that merchant's website and click on its information links or contact the merchant directly. You release us and our affiliates from any damages that you incur, and agree not to assert any claims against us or them, arising from your purchase or use of any products or services made available by third parties through the Site.

Your participation, correspondence or business dealings with any third party found on or through our Site, regarding payment and delivery of specific goods and services, and any other terms, conditions, representations or warranties associated with such dealings, are solely between you and such third party. You agree that COMPANY shall not be responsible or liable for any loss, damage, or other matters of any sort incurred as the result of such dealings.

You agree to be financially responsible for all purchases made by you or someone acting on your behalf through the Site. You agree to use the Site and to purchase services or products through the Site for legitimate, non-commercial purposes only. You also agree not to make any purchases for speculative, false or fraudulent purposes or for the purpose of anticipating demand for a particular product or service. You agree to only purchase goods or services for yourself or for another person for whom you are legally permitted to do so. When making a purchase for a third party that requires you to submit the third party's personal information to us or a merchant, you represent that you have obtained the express consent of such third party to provide such third party's personal information.

Interactive Features

This Site may include a variety of features, such as bulletin boards, web logs, chat rooms, and email services, which allow feedback to us and real-time interaction between users, and other features which allow users to communicate with others. Responsibility for what is posted on bulletin boards, web logs, chat rooms, and other public posting areas on the Site, or sent via any email services on the Site, lies with each user - you alone are responsible for the material you post or send. We do not control the messages, information or files that you or others may provide through the Site. It is a condition of your use of the Site that you do not:

- Restrict or inhibit any other user from using and enjoying the Site.
- Use the Site to impersonate any person or entity, or falsely state or otherwise misrepresent your affiliation with a person or entity.
- Interfere with or disrupt any servers or networks used to provide the Site or its features, or disobey any requirements, procedures, policies or regulations of the networks we use to provide the Site.
- Use the Site to instigate or encourage others to commit illegal activities or cause injury or property damage to any person.

- Gain unauthorized access to the Site, or any account, computer system, or network connected to this Site, by means such as hacking, password mining or other illicit means.
- Obtain or attempt to obtain any materials or information through any means not intentionally made available through this Site.
- Use the Site to post or transmit any unlawful, threatening, abusive, libelous, defamatory, obscene, vulgar, pornographic, profane or indecent information of any kind, including without limitation any transmissions constituting or encouraging conduct that would constitute a criminal offense, give rise to civil liability or otherwise violate any local, state, national or international law.
- Use the Site to post or transmit any information, software or other material that violates or infringes upon the rights of others, including material that is an invasion of privacy or publicity rights or that is protected by copyright, trademark or other proprietary right, or derivative works with respect thereto, without first obtaining permission from the owner or rights holder.
- Use the Site to post or transmit any information, software or other material that contains a virus or other harmful component.
- Use the Site to post, transmit or in any way exploit any information, software or other material for commercial purposes, or that contains advertising.
- Use the Site to advertise or solicit to anyone to buy or sell products or services, or to make donations of any kind, without our express written approval.
- Gather for marketing purposes any email addresses or other personal information that has been posted by other users of the Site.

COMPANY may host message boards, chats and other private/public forums on its Sites and on other platforms. Any user failing to comply with the terms and conditions of this Agreement may be expelled from and refused continued access to, the message boards, groups, chats or other such forums in the future. COMPANY or its designated agents may remove or alter any user-created content at any time for any reason. Message boards, chats and other public forums are intended to serve as discussion centers for users and subscribers. Information and content posted within these public forums may be provided by COMPANY staff, COMPANY's outside contributors, or by users not connected with COMPANY, some of whom may employ anonymous user names. COMPANY expressly disclaims all responsibility and endorsement and makes no representation as to the validity of any opinion, advice, information or statement made or displayed in these forums by third parties, nor are we responsible for any errors or omissions in such postings, or for hyperlinks embedded in any messages. Under no circumstances will we, our affiliates, suppliers or agents be liable for any loss or damage caused by your reliance on information obtained through these forums. The opinions expressed in these forums are solely the opinions of the participants, and do not reflect the opinions of COMPANY or any of its subsidiaries or affiliates.

COMPANY has no obligation whatsoever to monitor any of the content or postings on the message boards, chat rooms or other public forums on the Sites. However, you acknowledge and agree that we have the absolute right to monitor the same at our sole discretion. In addition, we reserve the right to alter, edit, refuse to post or remove any postings or content, in whole or in part, for any reason and to disclose such materials and the circumstances surrounding their transmission to any third party in order to satisfy any applicable law, regulation, legal process or governmental request and to protect ourselves, our clients, sponsors, users and visitors.

Registration

To access certain features of the Site, we may ask you to provide certain demographic information including your gender, year of birth, zip code and country. In addition, if you elect to sign-up for a particular feature of the Site, such as chat rooms, web logs, or bulletin boards, you may also be asked to register with us on the form provided and such registration may require you to provide personally identifiable information such as your name and email address. You agree to provide true, accurate, current and complete information about yourself as prompted by the Site's registration form. If we have reasonable grounds to suspect that such information is untrue, inaccurate, or incomplete, we have the right to suspend or terminate your account and refuse any and all current or future use of the Site (or any portion thereof). Our use of any personally identifiable information you provide to us as part of the registration process is governed by the terms of our Privacy Policy.

Passwords

To use certain features of the Site, you will need a username and password, which you will receive through the Site's registration process. You are responsible for maintaining the confidentiality of the password and account, and are responsible for all activities (whether by you or by others) that occur under your password or account. You agree to notify us immediately of any unauthorized use of your password or account or any other breach of security, and to ensure that you exit from your account at the end of each session. We cannot and will not be liable for any loss or damage arising from your failure to protect your password or account information.

Limitation of Liability

UNDER NO CIRCUMSTANCES, INCLUDING, BUT NOT LIMITED TO, NEGLIGENCE, SHALL WE, OUR SUBSIDIARY AND PARENT COMPANIES OR AFFILIATES BE LIABLE FOR ANY DIRECT, INDIRECT, INCIDENTAL, SPECIAL OR CONSEQUENTIAL DAMAGES THAT RESULT FROM THE USE OF, OR THE INABILITY TO USE, THE SITE, INCLUDING OUR MESSAGING, BLOGS, COMMENTS OF OTHERS, BOOKS, EMAILS, PRODUCTS, OR SERVICES, OR THIRD-PARTY MATERIALS, PRODUCTS, OR SERVICES MADE AVAILABLE THROUGH THE SITE OR BY US IN ANY WAY, EVEN IF WE ARE ADVISED BEFOREHAND OF THE POSSIBILITY OF SUCH DAMAGES. (BECAUSE SOME STATES DO NOT ALLOW THE EXCLUSION OR LIMITATION OF CERTAIN CATEGORIES OF DAMAGES, THE ABOVE LIMITATION MAY NOT APPLY TO YOU. IN SUCH STATES, OUR LIABILITY AND THE LIABILITY OF OUR SUBSIDIARY AND PARENT COMPANIES OR AFFILIATES IS LIMITED TO THE FULLEST EXTENT PERMITTED BY SUCH STATE LAW.) YOU SPECIFICALLY ACKNOWLEDGE AND AGREE THAT WE ARE NOT LIABLE FOR ANY DEFAMATORY, OFFENSIVE OR ILLEGAL CONDUCT OF ANY USER. IF YOU ARE DISSATISFIED WITH THE SITE, ANY MATERIALS, PRODUCTS, OR SERVICES ON THE SITE, OR WITH ANY OF THE SITE'S TERMS AND CONDITIONS, YOUR SOLE AND

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We may cancel or terminate your right to use the Site or any part of the Site at any time without notice. In the event of cancellation or termination, you are no longer authorized to access the part of the Site affected by such cancellation or termination. The restrictions imposed on you with respect to material downloaded from the Site, and the disclaimers and limitations of liabilities set forth in these Terms of Service, shall survive.

Refund Policy

Your purchase of a product or service or ticket to an event may or may not provide for any refund. Each specific product, service, event or course will specify its own refund policy.

Digital Millennium Copyright Act

The Digital Millennium Copyright Act of 1998 (the "DMCA") provides recourse for copyright owners who believe that material appearing on the Internet infringes their rights under the U.S. copyright law. If you believe in good faith that materials hosted by COMPANY infringe your copyright, you, or your agent may send to COMPANY a notice requesting that the material be removed or access to it be blocked. Any notification by a copyright owner or a person authorized to act on its behalf that fails to comply with requirements of the DMCA shall not be considered sufficient notice and shall not be deemed to confer upon COMPANY actual knowledge of facts or circumstances from which infringing material or acts are evident. If you believe in good faith that a notice of copyright infringement has been wrongly filed against you, the DMCA permits you to send to COMPANY a counter-notice. All notices and counter notices must meet the then current statutory requirements imposed by the DMCA; see <http://www.loc.gov/copyright> for details. COMPANY's Copyright Agent for notice shall be peter@ecommerceempirebuilders.com

Assignment

This Agreement shall be binding upon and inure to the benefit of COMPANY and our respective assigns, successors, heirs, and legal representatives. Neither this Agreement nor any rights hereunder may be assigned without the prior written consent of COMPANY. Notwithstanding the foregoing, all rights and obligations under this Agreement may be freely assigned by COMPANY to any affiliated entity or any of its wholly owned subsidiaries.

Dispute Resolution

These Terms of Use shall be governed by and construed in accordance with the laws of the State of Pennsylvania and any dispute shall be subject to binding arbitration in Doylestown PA. If any provision of this agreement shall be unlawful, void or for any reason unenforceable, then that provision shall be deemed severable from this agreement and shall not affect the validity and enforceability of any remaining provisions.

Class Action Waiver

You may only resolve disputes with us on an individual basis, and may not bring a claim as a plaintiff or a class member in a class, consolidated, or representative action. Class arbitrations, class actions, private attorney general actions, and consolidation with other arbitrations aren't allowed.

The arbitrator may not consolidate more than one person's claims, and may not otherwise preside over any form of a class or representative proceeding or claims (such as a class action, consolidated action or private attorney general action) unless all relevant parties specifically agree to do so following initiation of the arbitration.

Severability

If any clause within these Terms of Service (other than the Class Action Waiver clause above) is found to be illegal or unenforceable, that clause will be severed from these Terms of Service, and the remainder of these Terms of Service will be given full force and effect. If the Class Action Waiver clause is found to be illegal or unenforceable, the Dispute Resolution provision will be unenforceable and the dispute will be decided by a court.



Attachment D

EMPIRE BUILDERS GROUP, INC.

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- Link Five

Privacy Policy

Privacy Policy

Effective Date: December 2022

The following Privacy Policy governs the online information collection practices of Empire Holdings Group ("we" or "us"). Specifically, it outlines the types of information that we gather about you while you are using the www.ecommerceempirebuilders.com website (the "Site"), and the ways in which we use this information. This Privacy Policy, including our children's privacy statement, does not apply to any information you may provide to us or that we may collect offline and/or through other means (for example, at a live event, via telephone, or through the mail).

Please read this Privacy Policy carefully. By visiting and using the Site, you agree that your use of our Site, and any dispute over privacy, is governed by this Privacy Policy. Because the Web is an evolving medium, we may need to change our Privacy Policy at some point in the future, in which case we'll post the changes to this Privacy Policy on this website and update the Effective Date of the policy to reflect the date of the changes. By continuing to use the Site after we post any such changes, you accept the Privacy Policy as modified.

How We Collect and Use Information

We may collect and store personal or other information that you voluntarily supply to us online while using the Site (e.g., while on the Site or in responding via email to a feature provided on the Site). The Site only contacts individuals who specifically request that we do so or in the event that they have signed up to receive our messaging, attended one of our events, or have purchased one of our products. The Site collects personally identifying information from our users during online registration and online purchasing. Generally, this information includes name and e-mail address for registration or opt-in purposes and name, postal address, and credit card information when registering for our events or purchasing our products. All of this information is provided to us by you.

We also collect and store information that is generated automatically as you navigate online through the Site. For example, we may collect information about your computer's connection to the Internet, which allows us, among other things, to improve the delivery of our web pages to you and to measure traffic on the Site. We also may use a standard feature found in browser software called a "cookie" to enhance your experience with the Site. Cookies are small files that your web browser places on your hard drive for record-keeping purposes. By showing how and when visitors use the Site, cookies help us deliver advertisements, identify how many unique users visit us, and track user trends and patterns. They also prevent you from having to re-enter your preferences on certain areas of the Site where you may have entered preference information before. The Site also may use web beacons (single-pixel graphic files also known as "transparent GIFs") to access cookies and to count users who visit the Site or open HTML-formatted email messages.

We use the information we collect from you while you are using the Site in a variety of ways, including using the information to customize features; advertising that appear on the Site; and, making other offers available to you via email, direct mail or otherwise. We also may provide your information to third parties, such as service providers, contractors and third-party publishers and advertisers for a variety of purposes. Unless you inform us in accordance with the process described below, we reserve the right to use, and to disclose to third parties, all of the information collected from and about you while you are using the Site in any way and for any purpose, such as to enable us or a third party to provide you with information about products and services. If you do not wish your information to be used for these purposes, you must send a letter to the Online Privacy Coordinator whose address is listed at the end of this Privacy Policy requesting to be taken off any lists of information that may be used for these purposes or that may be given or sold to third-parties.

Please keep in mind that whenever you voluntarily make your personal information available for viewing by third parties online - for example on message boards, web logs, through email, or in chat areas - that information can be seen, collected and used by others besides us. We cannot be responsible for any unauthorized third-party use of such information.

Some of our third-party advertisers and ad servers that place and present advertising on the Site also may collect information from you via cookies, web beacons or similar technologies. These third-party advertisers and ad servers may use the information they collect to help present their advertisements, to help measure and research the advertisements' effectiveness, or for other purposes. The use and collection of your information by these third-party advertisers and ad servers is governed by the relevant third-party's privacy policy and is not covered by our Privacy Policy. Indeed, the privacy policies of these third-party advertisers and ad servers may be different from ours. If you have any concerns about a third party's use of cookies or web beacons or use of your information, you should visit that party's website and review its privacy policy.

The Site also includes links to other websites and provides access to products and services offered by third parties, whose privacy policies we do not control. When you access another website or purchase third-party products or services through the Site, use of any information you provide is governed by the privacy policy of the operator of the site you are visiting or the provider of such products or services.

Be aware that we may occasionally release information about our visitors when release is appropriate to comply with law or to protect the rights, property or safety of users of the Site or the public.

Please also note that as our business grows, we may buy or sell various assets. In the unlikely event that we sell some or all of our assets, or one or more of our websites is acquired by another company, information about our users may be among the transferred assets.

Google Analytics

We also use Google Analytics Advertiser Features to optimize our business. Advertiser features include:

- Remarketing with Google Analytics
- Google Display Network Impression Reporting
- DoubleClick Platform integrations
- Google Analytics Demographics and Interest Reporting

By enabling these Google Analytics Display features, we are required to notify our visitors by disclosing the use of these features and that we and third-party vendors use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to gather data about your activities on our Site. Among other uses, this allows us to contact you if you begin to fill out our check-out form but abandon it before completion with an email reminding you to complete your order. The “Remarketing” feature allows us to reach people who previously visited our Site, and match the right audience with the right advertising message.

You can opt out of Google’s use of cookies by visiting Google’s ad settings and/or you may opt out of a third-party vendor's use of cookies by visiting the [Network Advertising Initiative opt-out page](#).

Facebook

As advertisers on Facebook and through our Facebook page, we, (not Facebook) may collect content or information from a Facebook user and such information may be used in the same manner specified in this Privacy Policy. You consent to our collection of such information.

We abide by Facebook’s Data Use Restrictions.

- Any ad data collected, received or derived from our Facebook ad (“Facebook advertising data”) is only shared with someone acting on our behalf, such as our service provider. We are responsible for ensuring that our service providers protect any Facebook advertising data or any other information obtained from us, limit our use of all of that information, and keep it confidential and secure.

- We do not use Facebook advertising data for any purpose (including retargeting, commingling data across multiple advertisers’ campaigns, or allowing piggybacking or redirecting with tags), except on an aggregate and anonymous basis (unless authorized by Facebook) and only to assess the performance and effectiveness of our Facebook advertising campaigns.

- We do not use Facebook advertising data, including the targeting criteria for a Facebook ad, to build, append to, edit, influence, or augment user profiles, including profiles associated with any mobile device identifier or other unique identifier that identifies any particular user, browser, computer or device.
- We do not transfer any Facebook advertising data (including anonymous, aggregate, or derived data) to any ad network, ad exchange, data broker or other advertising or monetization related service.

General Data Protection Regulation (GDPR)

The GDPR took effect on May 25, 2018, and is intended to protect the data of European Union (EU) citizens.

As a company that markets its site, content, products and/or services online we do not specifically target our marketing to the EU or conduct business in or to the EU in any meaningful way. If the data that you provide to us in the course of your use of our site, content, products and/or services is governed by GDPR, we will abide by the relevant portions of the Regulation.

If you are a resident of the European Economic Area (EEA), or are accessing this site from within the EEA, you may have the right to request: access to, correction of, deletion of; portability of; and restriction or objection to processing, of your personal data, from us. This includes the “right to be forgotten.”

To make any of these requests, please contact our GDPR contact at peter@ecommerceempirebuilders.com

Rights of California Consumers

The California Consumer Privacy Act (CCPA) took effect on January 1, 2020, and has been amended by the California Privacy Rights Act (CPRA) effective January 1, 2023. These laws are intended to protect the personal information of California residents.

These laws have certain threshold requirements which a company must meet in order to be required to comply with its provisions. Upon information and belief, our company does not meet any of those thresholds. In the event of a change in our status, and if the data that you provide in the course of your use of our site, content, products and/or services is governed by CPRA, we will abide by the relevant portions of the Act.

If you are a resident of the state of California, you may have the right to: request disclosure of the personal information we have collected about you and the types of third parties to whom it has been sold or shared; request a portable copy of your information; opt out from marketing messages or the sale of your information to third parties; opt out of sharing your information for cross-context behavioral advertising; opt out from use of automated decision-making; limit use and disclosure of

sensitive personal information; request the correction of your personal information; and request deletion of your personal information.

To make these requests, please contact our California consumer privacy contact at peter@ecommerceempirebuilders.com

Children's Privacy Statement

This children's privacy statement explains our practices with respect to the online collection and use of personal information from children under the age of thirteen, and provides important information regarding their rights under federal law with respect to such information.

- This Site is not directed to children under the age of thirteen and we do NOT knowingly collect personally identifiable information from children under the age of thirteen as part of the Site. We screen users who wish to provide personal information in order to prevent users under the age of thirteen from providing such information. If we become aware that we have inadvertently received personally identifiable information from a user under the age of thirteen as part of the Site, we will delete such information from our records. If we change our practices in the future, we will obtain prior, verifiable parental consent before collecting any personally identifiable information from children under the age of thirteen as part of the Site.
- Because we do not collect any personally identifiable information from children under the age of thirteen as part of the Site, we also do NOT knowingly distribute such information to third parties.
- We do NOT knowingly allow children under the age of thirteen to publicly post or otherwise distribute personally identifiable contact information through the Site.
- Because we do not collect any personally identifiable information from children under the age of thirteen as part of the Site, we do NOT condition the participation of a child under thirteen in the Site's online activities on providing personally identifiable information.

How We Store Your Information

Your information is stored at the list server that delivers the Site content and messaging. Your information can only be accessed by those who help manage those lists in order to deliver e-mail to those who would like to receive the Site material.

All of the messaging or emails that are sent to you by the Site include an unsubscribe link in them. You can remove yourself at any time from our mailing list by clicking on the unsubscribe link that can be found in every communication that we send you.

Policy Updates

This policy may be changed at any time at our discretion. If we should update this policy, we will post the updates to this page on our Site.

If you have any questions or concerns regarding our privacy policy please direct them to:

peter@ecommerceempirebuilders.com



Attachment E

CONTACT US

How To Get In Touch With Us If You Are A Customer:

Technical Support: For issues logging in, purchasing products, or any other technical problem, please reach out to peter@ecommerceempirebuilders.com

Billing Support: For issues with failed payments, billing, refunds requests, payment options, etc... please reach out to peter@ecommerceempirebuilders.com

Program Support: If you are a customer and need support with your product, please post in the student Facebook group or come on the Q&A and coaching calls for your respective program.

General Inquiries:

General Enquiries: Please send an email to peter@ecommerceempirebuilders.com. Our office hours are Monday-Sunday 9am-9pm. We respond to customers first, so please allow 24 hours for a response.

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Attachment F

OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. 2423002

DATE RECORDED: OCTOBER 6, 2023
TRANSCRIBED: JANUARY 15, 2024

PAGES 1 THROUGH 14

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2423002

10/6/2023

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3 In the Matter of:)

4 2423002)

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7 October 6, 2023

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11 The following transcript was produced from a
12 digital file provided to For The Record, Inc. on
13 December 4, 2023.

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2423002

10/6/2023

1 P R O C E E D I N G S

2 - - - - -

3 Ecommerce Empire Builders - Call 1

4 REEVE TYNDALL: My name is Reeve Tyndall.

5 I'm an investigator with the Federal Trade Commission.

6 The date is October 6th, 2023. The time is 5:00 p.m.

7 Eastern time. This is a call to area code 215-965-

8 1473. I will be speaking with Tom from Ecommerce

9 Empire Builders.

10 (Phone ringing.)

11 TOM: [REDACTED] hey, Tom here with (inaudible).

12 REEVE TYNDALL: Oh, hi, is this Peter?

13 TOM: This is Tom here. I'm getting back to

14 you --

15 REEVE TYNDALL: Oh, okay.

16 TOM: -- from E-comm Empire regarding your

17 service.

18 REEVE TYNDALL: Yeah, yeah.

19 TOM: Well, good to be on with you. So,

20 first part of the call here, figure out where you're

21 at specifically, where you're looking to go, just to

22 see if we can help you in the first place.

23 How much of the video have you reviewed with

24 Peter thus far?

25 REEVE TYNDALL: I -- I think -- I watched

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1 two videos. It was a couple of days ago now. I
2 watched a video and then I, like, scheduled this call,
3 and --

4 TOM: (Inaudible) the 20-minute video you
5 reviewed?

6 REEVE TYNDALL: Yeah, I think so. I think
7 it was about that long.

8 TOM: Yeah, easy enough. Okay. And what --
9 what appealed to you, what attracted your -- your
10 attention?

11 REEVE TYNDALL: Oh, I mean, I'm just looking
12 for ways to kind of start a online business. I saw
13 you guys on Facebook and it looked interesting. Yeah,
14 and I just wanted to learn more.

15 TOM: Sure. What -- do you know what you're
16 looking for, meaning you, yourself, personally?

17 REEVE TYNDALL: Yeah, I mean, I -- I'd like
18 to be able to work from home. And it seems like
19 there's some opportunities online to do that. I have
20 some family issues going on, and, yeah, it'd just be
21 nice to be able to work from home.

22 TOM: What -- what are you doing for work
23 for a living now?

24 REEVE TYNDALL: So I work for a bank,
25 customer relations. I'm a bank teller.

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1 TOM: Oh, you are? Okay. How long you been
2 doing that type of work for?

3 REEVE TYNDALL: Gosh, almost 10 years now.

4 TOM: Okay. A couple years. Are you on
5 your own or do -- do you have a family you're taking
6 care of?

7 REEVE TYNDALL: I'm on my own. I'm taking
8 care of my mom right now.

9 TOM: Oh, you are?

10 REEVE TYNDALL: Yeah.

11 TOM: Okay. Okay, got it. Got it. Makes
12 sense. So the -- you know, the job that you have --
13 have now, you know, do you -- do you like what you're
14 doing for a living?

15 REEVE TYNDALL: I do. I mean, there's not
16 really very much potential to move up. There's
17 obviously not very much potential to work from home.

18 TOM: Sure, sure.

19 REEVE TYNDALL: So, I mean, day-to-day I'm
20 happy. I -- I'm not really, you know, satisfied long-
21 term.

22 TOM: Okay. Gotcha, gotcha. Okay. And
23 what's the -- the rationale here besides additional,
24 you know, income to work, you know, from home, but why
25 possibly have us build an e-comm business for -- for

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1 you, rather than, you know, get a work-from-home job?

2 REEVE TYNDALL: It -- it just seems like
3 there's more potential, more flexible hours.

4 TOM: Yeah.

5 REEVE TYNDALL: You know, I've always wanted
6 to kind of be a business owner.

7 TOM: Oh, yeah.

8 REEVE TYNDALL: And I know the online space
9 is -- there's a lot to do.

10 TOM: Okay.

11 REEVE TYNDALL: And I don't really have,
12 like, the vision of, like, what I'd want to do.

13 TOM: Hmm, okay.

14 REEVE TYNDALL: Yeah.

15 TOM: Okay. Makes sense. So what we can do
16 if you're open, we can schedule a next steps call. I
17 might be able to sneak you in here tomorrow, but other
18 -- otherwise we'll shoot for Monday. A little bit
19 longer call on Zoom, we do those calls and, you know,
20 go a bit deeper on the whole process, how we build
21 businesses and then we help our clients actually, you
22 know, run them successfully long-term.

23 Would -- would that help you out?

24 REEVE TYNDALL: Yeah, I'm -- yeah, I'm free
25 tomorrow.

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1 TOM: Yeah, easy enough. So what I'll do
2 here in the first -- first things first. Let me get
3 you a couple videos to review just so you have a
4 better understanding.

5 REEVE TYNDALL: Okay.

6 TOM: But -- and, also, [REDACTED] just from the
7 application, obviously for us to build, you know, the
8 business and actually help you -- help you run it and
9 scale it, there's going to be an up-front investment,
10 you know, capital required for us to actually do that.
11 So are you in a position, you know, to invest in
12 yourself, if it makes sense with what you're -- you're
13 looking for?

14 REEVE TYNDALL: Yeah, I mean, if it's the
15 right opportunity, totally.

16 TOM: Yeah. I mean, we're looking at -- for
17 us to build the whole business, it's going to be above
18 the 10K mark, just in all transparency.

19 REEVE TYNDALL: Yeah, no --

20 TOM: So I don't know, did you have that
21 type of capital available, et cetera?

22 REEVE TYNDALL: Yeah, I have that. I have
23 that money, yeah.

24 TOM: Yeah. Yeah, I just didn't want to
25 take up your -- your time if it wasn't -- wasn't

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1 feasible for you.
2 REEVE TYNDALL: No, no.
3 TOM: Where do you live? What time zone are
4 you?
5 REEVE TYNDALL: So I'm [REDACTED] right now.
6 TOM: Oh --
7 REEVE TYNDALL: I'm with my mom.
8 TOM: -- good stuff.
9 REEVE TYNDALL: Yeah.
10 TOM: Good weather.
11 REEVE TYNDALL: Yeah.
12 TOM: Is it Mountain or Pacific there?
13 REEVE TYNDALL: What's that? Oh, it's --
14 well, it's kind of weird because we don't do daylight
15 savings -- and, I'm sorry, my mom's dog is barking in
16 the background.
17 TOM: No worries. No worries. What -- help
18 -- help me understand what -- what time is it there
19 right now?
20 REEVE TYNDALL: Oh, it's 2:00 here.
21 TOM: Oh, it is. So it's GST. I mean, I
22 could sneak you in. I don't know if 9:00 or 10:00
23 your time is -- is doable for you?
24 REEVE TYNDALL: Yeah, 9:00 -- 9:00 is --
25 would -- would work for me, yeah. I assume a.m.

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1 TOM: Yeah, easy enough.
2 REEVE TYNDALL: Or --
3 TOM: I'm -- I'm sorry, say again?
4 REEVE TYNDALL: 9:00 a.m. tomorrow?
5 TOM: Of course, yeah, a million percent.
6 REEVE TYNDALL: Yeah, okay.
7 TOM: Million percent. I've got family I
8 take care of. So you're not that cool to -- to talk
9 to at 9:00 p.m. on a Saturday. So -- that's funny.
10 Let me get this over to you, this link.
11 REEVE TYNDALL: Okay.
12 TOM: Before I leave you, I want to make
13 sure you have it. So pretty self-explanatory.
14 There's a personal video from Peter. He does the
15 overarching on the process. Recent case studies finds
16 that we've helped scale/grow their businesses. And
17 then number three is like a -- you know, jot down your
18 -- your one to two-year big picture goals of what
19 you're looking to achieve, you know, with this. We
20 can go ahead and review that together tomorrow on
21 Zoom.
22 REEVE TYNDALL: Okay. Yeah, I -- I got -- I
23 got two -- two -- an email with a couple of links.
24 TOM: I didn't -- yep, I didn't send it yet.
25 So --

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1 REEVE TYNDALL: Oh, you didn't? Oh, okay.
2 TOM: I'll get it to you here now.
3 REEVE TYNDALL: Okay.
4 TOM: And you said just -- just to confirm
5 here, so 9:00 [REDACTED] time works tomorrow?
6 REEVE TYNDALL: Yeah, yeah, yeah. Yeah.
7 TOM: Okay.
8 REEVE TYNDALL: Yeah, yeah.
9 TOM: So I'm going to send you two emails.
10 I'm going to send you an invite for 9:00 a.m.
11 tomorrow.
12 REEVE TYNDALL: Okay.
13 TOM: If you want to go ahead and check your
14 -- your gmail and accept that invite, the
15 [REDACTED] And then I also sent you --
16 REEVE TYNDALL: Wait --
17 TOM: Maybe check your -- your bulk. It
18 might get filtered sometimes.
19 REEVE TYNDALL: Yep, no, I -- I got it. I
20 got it, yeah. Okay. And then I got something --
21 TOM: Yep. So go ahead and --
22 REEVE TYNDALL: -- another email --
23 TOM: Yeah. Go ahead and accept the invite.
24 I think you scroll from the bottom of that email up to
25 an invitation, click that yes button so it's confirmed

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1 on my calendar.
2 REEVE TYNDALL: Okay.
3 TOM: Did you see it?
4 REEVE TYNDALL: Yeah, yeah, I just clicked
5 it.
6 TOM: Yep. Smash that baby, and then --
7 what am I doing here? I think I just put links to
8 review coming from Tom H. at E-commerce Empire.
9 REEVE TYNDALL: Yep, yep, I got it.
10 TOM: Yeah, yeah. So go through it. Pretty
11 -- pretty basic, man, you know, steps one, two, three,
12 and then we'll -- we'll hop on Zoom and we'll have a
13 good chat and see if, you know, we -- we can help you,
14 you know, in some capacity here. Okay?
15 REEVE TYNDALL: Okay. Yeah, that's -- that
16 sounds great. Okay.
17 TOM: All right, [REDACTED] Good -- good talking
18 to you. Cheers. Bye for now.
19 REEVE TYNDALL: Okay. Yep, okay. Talk to
20 you later.
21 TOM: Bye.
22 REEVE TYNDALL: Yep, bye.
23 TOM: All right. Bye.
24 (The call was concluded.)
25 REEVE TYNDALL: My name is Reeve Tyndall.

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1 I'm an investigator with the Federal Trade Commission.
2 That was a call to area code 215-965-1473. The date
3 is October 6th, 2023. The time is now 5:10 p.m.
4 Eastern time. This ends the recording.
5 (The recording was concluded.)

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2

3

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8 supervision; that I had no role in the recording of
9 this material; and that it has been transcribed to the
10 best of my ability given the quality and clarity of
11 the recording media.

12 I further certify that I am neither counsel
13 for, related to, nor employed by any of the parties to
14 the action in which these proceedings were
15 transcribed; and further, that I am not a relative or
16 employee of any attorney or counsel employed by the
17 parties hereto, nor financially or otherwise
18 interested in the outcome of the action.

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21 DATE: 1/15/2024



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FEDERAL TRADE COMMISSION

MATTER NO. 2423002
DATE RECORDED: OCTOBER 9, 2023
TRANSCRIBED: JANUARY 8, 2023
PAGES 1 THROUGH 26

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1 P R O C E E D I N G S
2 - - - - -
3 Ecommerce Empire Builders - Call 2
4 TOM: Hello, Tom here.
5 REEVE TYNDALL: Yep. Hey, Tom.
6 TOM: Are you with me? How you doing?
7 REEVE TYNDALL: Good -- good. How are you
8 doing?
9 TOM: Yeah, doing -- doing well. So I can
10 send you my Zoom link. Is it best to email you?
11 REEVE TYNDALL: Can -- I don't have Zoom on
12 my computer. Could you do, like, Google Meet or
13 something?
14 TOM: You don't have to have it on your
15 computer. I'm using -- or we use our Zoom account.
16 You can just run it off your browser.
17 REEVE TYNDALL: Oh, okay.
18 TOM: Or we can -- we can rebook if you'd
19 like.
20 REEVE TYNDALL: No, no, no, no. No, no.
21 Yeah, send me the link.
22 TOM: Or you can do it on your phone, too.
23 REEVE TYNDALL: Yeah, I can try to -- try to
24 do it on my -- email me the link and I can try to do
25 it on my computer.

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1 TOM: Yeah, I'll get it over to you in one
2 -- one minute over here.
3 REEVE TYNDALL: I do have Google Meet. I
4 can do that.
5 TOM: Yeah, we do everything on -- on Zoom
6 here (inaudible). I just emailed you the link. Let
7 me know that you have it.
8 REEVE TYNDALL: Okay. Okay, hold on. I'll
9 click on it --
10 TOM: Do you have it?
11 REEVE TYNDALL: Yeah, I do have it.
12 UNIDENTIFIED SPEAKER: (Inaudible).
13 TOM: I don't know. Well, I'm on
14 (inaudible) meeting. Right?
15 Is it working for you or do you need me to
16 help walk you through?
17 REEVE TYNDALL: Let's see -- sorry, I just
18 have a crappy phone.
19 TOM: So if we can rebook for Wednesday here
20 and you can get Zoom on your computer, I'd almost
21 prefer -- prefer that. If we have a good -- good
22 connection, we can (inaudible) properly.
23 MESSAGE: Enter your --
24 (Buttons pressed.)
25 REEVE TYNDALL: Oh --

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1 ZOOM: Enter your --
2 (Buttons pressed.)
3 ZOOM: Enter your participant ID, followed
4 by pound, or just press (inaudible).
5 (Button pressed.)
6 ZOOM: You are in the meeting now. There
7 are no other participants in the meeting. This
8 meeting --
9 REEVE TYNDALL: Oh -- oh, I think I tried to
10 call in. It won't let me -- it says launch meeting,
11 but it says cannot open --
12 TOM: Hit the launch meeting button and then
13 it should populate. Those are the --
14 REEVE TYNDALL: Yeah, it says Safari cannot
15 open the page because the address is invalid.
16 TOM: Why don't you -- do you want to try --
17 do you want to just download it on your computer and
18 we can rebook the call, then?
19 REEVE TYNDALL: Okay. Yeah, I can do that.
20 Yeah, when -- when do you want to do it? Sorry, I
21 thought -- I thought you were going to call me.
22 TOM: Well, I mean, we could do the call on
23 Zoom, but I -- or on the phone, but we usually do it
24 just with the screen-sharing of information, really.
25 It sounds like you've got a little dog in the

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1 (inaudible).

2 REEVE TYNDALL: Oh, yeah. My -- my mom's
3 dog. But is there -- could you email me something to
4 look at, or --

5 TOM: Not really. Everything is usually
6 done -- done on Zoom. I mean, we can keep going here
7 on audio.

8 REEVE TYNDALL: Okay.

9 TOM: I mean, is that going to be -- are you
10 going to be able to be focused for that?

11 REEVE TYNDALL: Oh, yeah, definitely.

12 TOM: So tell me -- I know you're taking
13 care of your mom. Like, what do you do for work for a
14 living now, currently?

15 REEVE TYNDALL: So I'm a -- I'm a bank
16 teller, although I'm -- I'm off for my -- my job while
17 I'm here with her.

18 TOM: Okay. How long you been taking care
19 of mom?

20 REEVE TYNDALL: What, it's been almost a
21 month now. So obviously not paid. But -- but I do
22 have that when I go back. So ...

23 TOM: Mm-hmm. Okay. Okay, got it. And are
24 you -- I guess when I mentioned to -- for us to build
25 the business for you, it's going to be around that 10

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1 to 15K mark. Do you -- I just want to make sure
2 that's going to be reasonable for you. Is that -- do
3 you have that in credit or personal savings? Like,
4 what does that look like for -- for you?

5 REEVE TYNDALL: No, I -- I definitely have
6 the savings.

7 TOM: Mm-hmm. Awesome. Okay. So kind of
8 tell me what's -- what's the motivation here, I guess?
9 Let's say we came in, build a business for you, get it
10 up and running and selling at around day 35, like,
11 what -- what would you do with the extra income coming
12 in?

13 REEVE TYNDALL: I mean, I would take care of
14 my mom. I have some debts, you know, I'd like to pay
15 off and kind of get on a good foot myself.

16 TOM: What kind of debts, if I can ask?

17 REEVE TYNDALL: I just have some credit card
18 debt, and I have a little bit of student loans, and a
19 car payment.

20 TOM: Okay. What's your student loans at
21 roughly?

22 REEVE TYNDALL: So I'm at 32 now. I haven't
23 had to pay -- make payments until this month because
24 it's been frozen because of the -- the COVID stuff.

25 TOM: Got it.

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1 REEVE TYNDALL: But I'm on -- they're all
2 federal. So my payments are pretty low.

3 TOM: Okay.

4 REEVE TYNDALL: But if I -- you know, have a
5 lot of money, if I'm bringing more money in, I
6 definitely start paying those off more aggressively,
7 yeah.

8 TOM: Right. And why -- why so important to
9 do this now, though?

10 REEVE TYNDALL: I mean, honestly, you know,
11 I -- I'm trying to juggle, you know, taking care of my
12 mom with living my own life, and it's becoming more
13 apparent that -- I mean, I have to stay out here
14 longer. And so, you know, I'd like to be able to do
15 something from home, something more flexible, yeah.

16 TOM: Sure, sure. Okay. So what I can do
17 here is go through a few questions here that most
18 people have when they're looking for us to build the
19 business for them.

20 REEVE TYNDALL: Okay.

21 TOM: But, more importantly, you know, run
22 and grow it, you know, long -- long-term. Would that
23 help you out?

24 REEVE TYNDALL: Yeah, that would really
25 help, yeah.

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1 TOM: Yeah. Easy -- easy-peasy. Do you
2 have a pen and paper handy? I'm going to put you to
3 work just a bit.

4 REEVE TYNDALL: Sure. Hold on one second.
5 Okay, I'm ready.

6 TOM: Okay. All righty. So -- excuse me.
7 So typically one -- one of the biggest challenges,
8 okay, people have when -- when starting their ecom
9 business and the reason why they want Peter to
10 actually build the business for them is they just
11 don't want to do it, or they, you know, have their
12 store set up on their own, maybe they tried Amazon,
13 Shopify, and they didn't really profit in the past,
14 you know. Because of that, it causes them to, you
15 know, never go ahead with something, or they lost the
16 -- the desire to moreso do it themselves.

17 Now, the way we solve that, okay, for our
18 members is by placing them in our done-for-you
19 program, okay, where fundamentally along with Peter
20 we're actually building your store on your websites so
21 that you can start attracting customers, you know,
22 that are going to buy from you over and over again.
23 Okay?

24 Now, the main element is you don't even have
25 to worry about any of that at all. Okay? We're going

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1 to build everything for you. And what that means to
2 you is, you know, you're going to be able to, in 30
3 days, when the store goes live, start bringing in
4 profits at day 30 of starting with us. Okay?

5 Now, do -- do you see how that -- that done-
6 for-you, you know, approach moreso is going to work
7 for you?

8 REEVE TYNDALL: Yeah. I mean, that -- that
9 would be great because I've never -- I've never had a
10 business before. Yeah, I don't -- I wouldn't even
11 know how to start. So, yeah.

12 TOM: Okay. Yeah, so -- so Peter shows us
13 how to use the foundation of the business, which has
14 his initial product sales as kind of our lead
15 generation. Now, as we guide that customer down your
16 funnel, you know, we get them to subscribe and buy in,
17 you know, to the how-to solve the problem, you know,
18 what they actually bought that product for in the
19 first place.

20 They're happy to pay for that because it's
21 giving that customer, you know, that added value to
22 their lives, which allows -- basically it makes it
23 pretty easy, you know, to upsell, downsell, their
24 customers, but moreso our main goal is to put your
25 customer into a subscription-based model, which

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1 basically allows you to have them pay you every single
2 month. Okay?

3 And what that means to you is instead of
4 stressing on the first of the month like a lot of
5 businesses, because they start out at, you know, zero
6 sales, you're already going to have dozens, obviously
7 working towards hundreds, of sales being made from
8 back-end subscriptions to scale your monthly profits a
9 lot easier and faster. Okay?

10 Now, I guess, what aspects do you see, you
11 know, that I can describe might help you the most with
12 the -- the subscriptions?

13 REEVE TYNDALL: So I guess, like,
14 logistically, like, what -- what -- what would -- what
15 would I be doing at -- for the business, and, like,
16 what would you guys be doing?

17 TOM: So -- ask that again, please. How do
18 you mean?

19 REEVE TYNDALL: Oh, like -- like what --
20 what am I going to be doing? Am I going to, like --
21 how am I going to get the people to sign up?

22 TOM: Yeah. So that's going to be through
23 -- you know, through your basic, you know, ads on
24 social media.

25 REEVE TYNDALL: Okay.

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1 TOM: Just kind of what -- what the -- what
2 the video Peter broke down. Okay?

3 REEVE TYNDALL: Okay.

4 TOM: So Facebook, Instagram, you know,
5 there's a lot of affordable traffic to build your
6 business on -- on those, you know, media sites. Does
7 -- does that make sense?

8 REEVE TYNDALL: Yeah.

9 TOM: So we -- we build -- we build that all
10 for you, write that for you, and get it selling at
11 around day 30, and then we --

12 REEVE TYNDALL: Okay.

13 TOM: -- moreso do it -- do it with you
14 under our supervision. Okay?

15 REEVE TYNDALL: Okay. And then, like, so --
16 are -- like -- is -- so it's -- it's 10,000, you said,
17 to get started?

18 TOM: Correct. Correct, yeah.

19 REEVE TYNDALL: Okay. And then, like, is
20 there, like, monthly costs, or --

21 TOM: Yeah. So there's going to be costs as
22 far as 30 bucks a day for the first 30 days after we
23 build the business and hand it over to you.

24 REEVE TYNDALL: Okay.

25 TOM: That's going to moreso be -- be to

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1 scale your positive assets.

2 REEVE TYNDALL: Okay.

3 TOM: And then as far as your funnel
4 software, that's going to be around 70 bucks a month.
5 That's basically the engine of your car. It's going
6 to run all the sales pages for you to keep the whole
7 business live. Okay?

8 REEVE TYNDALL: Okay.

9 TOM: So any questions on -- on how that
10 works?

11 REEVE TYNDALL: I guess, like, okay, so the
12 -- the -- for those, like, first 30 days, like, what
13 -- what -- what would my, like, day-to-day look like?

14 TOM: Yeah. So we're building the whole
15 business for you. So we're going to have you -- you
16 know, it's your business. So you're going to set up
17 your bank account for obviously the sales, et cetera.
18 So you would do that, but while we're building your
19 business for you, basic -- basic stuff like that,
20 setting up your ads account and then your -- your
21 business bank account. And we would be building the
22 whole business for you in its entirety. Okay?

23 REEVE TYNDALL: Okay. And then after --
24 after it starts, about 30 days, what -- what am I
25 doing day-to-day, like how many hours and stuff like

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1 that?

2 TOM: Yeah. I mean, I'd say you can get
3 away with probably five -- five to 10 hours weekly.
4 Okay?

5 REEVE TYNDALL: Okay.

6 TOM: And we basically -- you're running the
7 business under our supervision. So the second
8 question clients have is once we build the business,
9 what type of support will they have to make sure they
10 have that income? We keep growing that every single
11 month. Okay?

12 So basically we -- we start off by running
13 workshop calls three days weekly. And what happens
14 and how this supports our clients in these calls is
15 that Peter just gets on Zoom with you and shows you
16 exactly what we're doing to grow your business, okay,
17 in a real done-with-you fashion.

18 REEVE TYNDALL: Okay.

19 TOM: Now, we also have base camp as your
20 safety net, seven days weekly. How that supports you
21 is when you have a question or a second opinion on
22 anything, you can simply submit that so that our team
23 can respond right away with a solution.

24 REEVE TYNDALL: Okay.

25 TOM: Now, if you need one-on-one support,

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1 you can book -- literally book unlimited one-on-one
2 calls with our team Monday through Friday where our
3 team helps you through any question literally step-by-
4 step.

5 REEVE TYNDALL: Okay.

6 TOM: I guess how -- how do you see what --
7 with what I described as support might help you the
8 most?

9 REEVE TYNDALL: I mean, I think the -- the
10 walking me through would -- would -- would work for
11 me. I mean, I am a pretty quick learner. So if it's
12 -- you know, I can learn it once, and then if I can
13 just keep doing it, that would be great. And then, I
14 guess, if just things come up later on, I could do the
15 -- get the support.

16 TOM: Ninety percent, 90 percent, yeah.
17 Yeah. And then finally this is where Peter, again,
18 puts you in the CEO position by helping you oversee
19 the marketing, the artificial intelligence, and the
20 virtual assistant to run all the customer support --

21 REEVE TYNDALL: Okay.

22 TOM: -- which will allow you to be working
23 on the business and, you know, not caught up in the
24 trenches day-to-day like an employee.

25 REEVE TYNDALL: Okay. And then, like, would

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1 I -- so I'm -- I'd be signing up customers and then
2 would I get, like, monthly income, or how -- how does
3 that work?

4 TOM: Yeah, correct. So making sales, and
5 then as far as our front-end sales, we're going to
6 shoot around 30 to 40 percent profit, and then our
7 back-end we're going to shoot about, you know, 50 to
8 70 percent profit margin from back-end subscriptions.

9 REEVE TYNDALL: Okay. And how --

10 TOM: So when we make -- go ahead.

11 REEVE TYNDALL: Okay. And so how -- do --
12 am I, like, selling stuff on the phone, or how am I
13 selling it?

14 TOM: Well, no, absolutely. You've been
15 through the video with Peter. Correct?

16 REEVE TYNDALL: Yeah.

17 TOM: Yeah. We build the whole store. So
18 if I see your -- your Instagram ad on Instagram and
19 maybe you sell -- you know, the dog niche, or puppy
20 toys or whatnot, if I buy -- you know, or camping
21 gear, if you're in the outdoor niche, you know, that
22 we build the whole business for you. So the whole
23 sales page, video, images, all that, is going to be in
24 the funnel, which we write for you. That's going to
25 be making the sales.

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1 REEVE TYNDALL: I see. Okay. But then,
2 like, if there's, like, the -- like, what about, like,
3 customer support and stuff like that?

4 TOM: We show you how to place a virtual
5 assistant in your business to run all the day-to-day
6 customer support.

7 REEVE TYNDALL: Okay. And then, like --

8 TOM: It's pretty basic.

9 REEVE TYNDALL: So, like -- so I would be
10 just, like, kind of managing everyone at that point,
11 or --

12 TOM: Yeah, I mean, managing, running the
13 ads. You know, we do that with you. And then you'd
14 have your virtual assistant, who you would pay, in a
15 sense --

16 REEVE TYNDALL: Okay.

17 TOM: -- probably five -- five bucks --
18 five/10 bucks a day.

19 REEVE TYNDALL: Okay. And -- and then so,
20 like, how long have you guys been doing this? Have
21 you been, like, successful, like --

22 TOM: Yeah. How much of the videos have you
23 -- I mean, we've been doing this, you know, for eight
24 years. We're an Inc. 5000 company. Did you review
25 the whole videos? Not to be rude, but I just want

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1 to --

2 REEVE TYNDALL: No, no. I did, I did. I
3 definitely did.

4 TOM: Yeah. Yeah, yeah. Yeah, so, I mean,
5 we have over, you know, 500 successful, you know,
6 builds.

7 REEVE TYNDALL: Oh, okay. And, like, so --
8 okay. And then, like, how much -- how much could I,
9 like, expect to make after, like, that first month?

10 TOM: Yeah, a loaded question. So, I mean,
11 we're not going to make an income claim. That'd be
12 just, you know, unethical on -- on our part. But,
13 again, most members showing up, doing the work with
14 us, are very happy with progress usually the first,
15 you know, three/four months in working with our team.

16 REEVE TYNDALL: Okay. Okay. Yeah, I mean,
17 I -- I think -- it said to write down my goals. I
18 mean, I think I'm looking for, like, a -- something
19 that could replace my full-time job.

20 TOM: What are you usually making -- used to
21 making?

22 REEVE TYNDALL: So I was making a little
23 over 60 and a small bonus every year. But, yeah, 60.

24 TOM: Okay. That definitely can be
25 feasible. I mean, it's going to be a process to work

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1 up to that. It's not going to be -- you know,
2 obviously a lottery ticket. It's going to take work
3 to work up to that. But it's definitely -- definitely
4 would be feasible. You know, we have -- we have
5 hundred -- hundred-plus people in the 100K club. You
6 know, that'd be over 10 -- 10K per month.

7 REEVE TYNDALL: Oh, okay.

8 TOM: So that -- right. And the -- the buy-
9 back guarantee, as well, as long as you show up and
10 work with us, in the 18 months, if you're not happy
11 with your progress, Peter would offer to buy the --
12 the business back from you.

13 REEVE TYNDALL: Okay. Yeah, I mean, I saw
14 that on the website and that -- that -- that seemed
15 really good, actually. Because it is -- I mean, I
16 have the money, but it is a lot of money.

17 TOM: Right.

18 REEVE TYNDALL: Yeah. Okay. Well, is there
19 -- what are, like, the next steps?

20 TOM: Well, it's going to be the -- as far
21 as the four months -- the full build of the business,
22 getting -- selling at day 30 and then four months of
23 coaching support afterwards. It's going to be the
24 investment of just 10K.

25 REEVE TYNDALL: Okay.

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1 TOM: Okay? So any questions on how -- how
2 that works?

3 REEVE TYNDALL: No. I mean, I think the
4 video -- the videos went over a lot of the -- the
5 nitty-gritty stuff.

6 TOM: Uh-huh, yeah.

7 REEVE TYNDALL: Yeah.

8 TOM: Yeah. So -- so do you -- do you feel
9 like this can be the -- the answer for you?

10 REEVE TYNDALL: Yeah, I mean, definitely.

11 TOM: Yeah. Why do you feel like it is,
12 though?

13 REEVE TYNDALL: I mean, the money-back
14 guarantee is -- or the buy-back guarantee is -- is --
15 is -- sounds pretty good to me. And the track record,
16 too, sounds good.

17 TOM: Ninety percent. And do you feel like
18 this is something that you -- you and our team can do
19 together to get you up to that, you know, 5K per month
20 to, you know, replicate the 60K per year that you're
21 doing?

22 REEVE TYNDALL: Yeah, I -- I think that
23 sounds good, yeah.

24 TOM: Okay. Was there anything that was
25 kind of the key to the castle for you with the

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1 training or the support that I described?

2 REEVE TYNDALL: I mean, I -- because I had
3 never done this before. I wouldn't even know, like,
4 what are -- like, what would be some issues that would
5 come up running the business? Like, what are -- what
6 are common --

7 TOM: Well, I mean, you know, you're
8 building a business. So, I mean, it's -- it's going
9 to -- it's going to be a process. But that's why,
10 again, we have that -- that high level of support, the
11 unlimited one-to-one call bookings Monday through
12 Friday, you know, throughout the week to -- when you
13 do have a hiccup or a speed bump, maybe, you know,
14 trying to scale ads or whatnot, we would -- we would
15 obviously walk you through that on an intimate basis.

16 REEVE TYNDALL: Okay.

17 TOM: Yeah.

18 REEVE TYNDALL: Yeah, no, that makes sense.

19 TOM: Okay.

20 REEVE TYNDALL: Okay.

21 TOM: So next step -- yeah, so pretty basic
22 next step would be here, is we'd make some type of
23 arrangement for the program, you could use a credit
24 card, or you could do an ACH, you know, so you
25 wouldn't have to do -- pay the -- you know, the

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1 carrying charges on that, the credit card fees.

2 REEVE TYNDALL: Okay.

3 TOM: And then at that point we'll actually
4 get you on Steve Swaft's (ph) calendar. He's our
5 niche and product expert. And then we'd literally
6 start the process of building your business.

7 REEVE TYNDALL: Okay.

8 TOM: Okay? So how -- how do you want to
9 proceed from -- from here?

10 REEVE TYNDALL: I mean, is there -- do I
11 have to, like, sign a contract or anything, or --

12 TOM: Yeah, absolutely. So you'd have --
13 we'd have the agreement that you would review and
14 authorize, you know, as well.

15 REEVE TYNDALL: Okay. Yeah, I mean, if you
16 want to send me the -- whatever -- whatever I -- I
17 need to review. Obviously I'm not just going to sign
18 something.

19 TOM: Yeah, I'm not asking you to. So I
20 would -- I can get that over to you.

21 REEVE TYNDALL: Okay.

22 TOM: How does your day look tomorrow for a
23 next-steps call, [REDACTED]

24 REEVE TYNDALL: I'm -- I'm -- I mean, I'm
25 pretty open. I have a doctor's appointment I have to

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1 head to in the morning, but --
2 TOM: At 2:00 in the morning?
3 REEVE TYNDALL: No, no, not 2:00 in the
4 morning. In the morning. So in the afternoon's
5 probably better for me.
6 TOM: It's like -- does -- does 12:30
7 Pacific work for you?
8 REEVE TYNDALL: Yeah, that should work.
9 TOM: Got it. Okay.
10 REEVE TYNDALL: And I --
11 TOM: I'm going to send you --
12 REEVE TYNDALL: Yeah, I mean, I can try to
13 -- I can download Zoom, too, or try to download it.
14 TOM: Yeah. Easy enough. Okay. So I'm
15 going to get moving here. I'll get you the agreement
16 and then we'll -- we'll plan on 12:30, then. Okay?
17 REEVE TYNDALL: Okay. That sounds good.
18 Well, thank you so much.
19 TOM: Okay. Sounds good. All right, [REDACTED]
20 Talk to you soon.
21 REEVE TYNDALL: Okay. Thank you. Okay.
22 TOM: Bye.
23 REEVE TYNDALL: Bye.
24 (The call was concluded.)
25 REEVE TYNDALL: My name is Reeve Tyndall.

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25

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1 I'm an investigator with the Federal Trade Commission.
2 That was a call received from area code 215-965-1473.
3 The date is October 9th, 2023. The time is now 6:30
4 p.m. This ends the recording.

5 (The recording was concluded.)

6

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1 CERTIFICATE OF TRANSCRIPTIONIST

2

3

4 I, George Quade, do hereby certify that the
5 foregoing proceedings and/or conversations were
6 transcribed by me via CD, videotape, audiotape or
7 recording, and reduced to typewriting under my
8 supervision; that I had no role in the recording of
9 this material; and that it has been transcribed to the
10 best of my ability given the quality and clarity of
11 the recording media.

12 I further certify that I am neither counsel
13 for, related to, nor employed by any of the parties to
14 the action in which these proceedings were
15 transcribed; and further, that I am not a relative or
16 employee of any attorney or counsel employed by the
17 parties hereto, nor financially or otherwise
18 interested in the outcome of the action.

19

20

21 DATE: 1/8/2024

22

23

24

25



GEORGE QUADE, CERT

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Attachment H

Master SERVICE AGREEMENT

This Master Service Agreement ("Agreement") is entered into and effective as of _____ ("Effective Date"), between EMPIRE HOLDINGS GROUP, LLC a Wyoming Limited Liability Company with its principal place of business at 2370 York Rd., Jamison, PA 18929 ("EMPIRE") and _____ ("CLIENT"), with a principal place of business at _____. EMPIRE and CLIENT are each a "Party" and together are the "Parties".

WHEREAS, EMPIRE is in the business of offering services, including Business Consulting, Business Development, Team Building, Organizational Consulting, and Business Coaching (collectively, "Services");

WHEREAS, CLIENT seeks to retain the services of EMPIRE;

Now, therefore, for adequate consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

1. **Services.** Subject to the terms and conditions of this Agreement, EMPIRE agrees to provide, or arrange for a third-party to provide, at Client's expense, the Services, as defined in the Statement of Work ("SOW") annexed hereto and made a part hereof as Exhibit A ("Services") or which may be agreed to by the parties in the future. To the extent that the terms of a SOW conflict with the terms of this Agreement, the applicable SOW shall control.
2. **Term.** This Agreement is effective as of the Effective Date and continues in full force and effect for the period stated in the last expiring SOW ("Term") subject to CLIENT's strict compliance with the terms of this Agreement, unless terminated in accordance with the terms of this Agreement.
3. **Termination.** EMPIRE may terminate this Agreement upon thirty (30) days prior written notice to the CLIENT.
4. **Fees/Commissions.** Fees and/or commissions payable hereunder shall be paid in accordance with applicable SOWs or Fee Agreements agreed to by the Parties.
5. **Work Made for Hire.** The results and proceeds of EMPIRE's Services hereunder shall be deemed a "work-made-for-hire" specifically ordered by CLIENT. EMPIRE acknowledges and agrees that all copyrightable material, including writings, software, drawings, recordings, videos, audios, workbooks and designs, and all ideas, inventions, improvements, developments and discoveries made, conceived or reduced to practice by EMPIRE, whether individually or in collaboration with others, during the course of performance under this Agreement, are the sole property of CLIENT (the "Work"); and EMPIRE agrees to assign (or cause to be assigned) to CLIENT all right, title and interest in and to all such intellectual property associated with the Work, including without limitation any worldwide copyright(s), moral rights, patent(s) and any and all other such rights of whatever kind, and the right to obtain registrations, renewals, reissues and extensions of the same. EMPIRE shall ensure that all contractors working on this account shall agree to these terms. Notwithstanding the foregoing, it is acknowledged that EMPIRE and its staff have years of experience in connection with the Services and that EMPIRE's expertise, approaches, proprietary copy, templates and the like are EMPIRE's property. To the extent such materials incorporated into materials prepared hereunder for CLIENT, such materials are granted to CLIENT subject to a perpetual, irrevocable, non-exclusive, royalty-free license, solely for use in the Work.
6. **Representations and Warranties.**

a. Neither Party shall use, copy nor disclose in any manner the Confidential Information of the other Party except as may be expressly permitted by this Agreement. "Confidential Information" means each Party's customer records, accounting records, and any technical, business, and financial information and data of a Party including, but not limited to, know-how, compilations, programs, inventions, methods, applications, techniques, processes, patents, trademarks and other intellectual property, trade secrets, ideas, pricing, customers and prospective customer identities, strategies, and other types of information similar to any or all of the above, whether the information is oral, visual or written and regardless of whether it is marked or identified as confidential. Each item of Confidential Information is independent of every other item of Confidential Information and the use, copying or disclosure of one such item shall not permit the use, copying or disclosure of any other item of Confidential Information.

b. Confidential Information does not include the following, provided the Party receiving the information ("Receiving Party") can establish that the information: (i) was previously known to Receiving Party without any obligation to keep it confidential; (ii) was or became available to the public, provided the disclosure was not unauthorized and was not given under circumstances where it was intended to remain confidential; (iii) was developed by or on behalf of Receiving Party independent of any information Receiving Party learned through its engagement with the other Party or arising out of this Agreement or any prior relationship between the Parties; or (iv) was received from a person or entity other than the Party disclosing the information ("Disclosing Party") and the disclosure does not violate the Disclosing Party's rights to keep the information confidential unless there is a written agreement between the Parties to share such data between them.

7. **Data Privacy and Information Security.** Each Party will maintain administrative, physical and technical safeguards for the protection of the security, confidentiality and integrity of the other Party's Confidential Information and/or other data that are consistent with industry standards for similar information and/or data. Each Party agrees that it will not take any steps to avoid or defeat the purpose of security measures associated with the Services, including without limitation: (i) the sharing of login information and/or passwords; (ii) attempts to compromise authentication protocol; (iii) reverse engineering of security measures or any software used in providing the Services; (iv) deconstruction or

public sharing of proprietary code; or (v) any other steps that would use any means to avoid or defeat (or allow others to avoid or defeat) existing security measures associated with the Services. Each Party shall notify the other immediately if it detects a breach of security.

8. Mark Licenses. Each Party hereby grants to the other a limited, revocable, non-exclusive, non-assignable, non-transferable license, without right to sublicense, to use its logos, brand names, and/or other trademarks or service marks, whether registered or unregistered ("Marks"), solely for use in connection with the Services. Marks must be reproduced as exact copies and all use of the Marks is subject to the licensor's usage guidelines as revised from time to time and available from the licensor. The licensee of the Marks ("Licensee") acknowledges and agrees that all right, title and interest in the Marks licensed by such other Party ("Licensor") is exclusively owned by Licensor, or its licensors (in which case Licensor has the right to sublicense its rights to the Marks as described in this paragraph), and that all use of Licensor's Marks inures to the benefit of Licensor. Licensee shall not assert any intellectual property or other ownership rights in the Licensor's Marks or in any element, derivation, adaptation, or variation thereof. Licensee shall not contest the validity of, or Licensor's ownership of, or licensed rights in, any of Licensor's Marks. Licensee shall not, in any jurisdiction, adopt, use, or register, or apply for registration of, whether as a corporate name, trademark, service mark or other indication of origin, or as a domain name, any of Licensor's Marks, or any word, name, symbol or device, in any combination confusingly similar to any of Licensor's Marks. Licensee may not alter Licensor's Marks in any manner, or use Licensor's Marks in any manner that may dilute, diminish, or otherwise damage Licensor's rights and goodwill in its Marks. Licensee may not use Licensor's Marks in any manner that implies sponsorship or endorsement by Licensor of Licensee services and products other than those expressly authorized by Licensor.

9. Indemnity. CLIENT shall defend, indemnify and hold harmless EMPIRE and its agents, employees, officers, directors, members, owners, successors and assigns from and against any and all claims, costs, damages, losses or expenses (including without limitation reasonable attorney fees and costs) arising out of CLIENT'S or any third party's negligence or willful misconduct, or CLIENT'S breach of this Agreement, including any warranty or representation made by CLIENT herein, or of any applicable laws or regulations. EMPIRE shall defend, indemnify and hold harmless CLIENT and its agents, employees, officers, directors, shareholders, owners, successors and assigns, from and against any and all claims, costs, damages, losses or expenses (including, without limitation, reasonable attorney fees and costs) arising out of EMPIRE's negligence or willful misconduct, or its breach of this Agreement, including any warranty or representation made by EMPIRE herein, or of any applicable laws or regulations.

10. Limitations of Liability. IN NO EVENT SHALL EITHER PARTY BE LIABLE TO THE OTHER OR TO ANY THIRD PARTY FOR INCIDENTAL, CONSEQUENTIAL, INDIRECT, EXEMPLARY, PUNITIVE OR OTHER SPECIAL DAMAGES REGARDLESS OF WHETHER SUCH PARTY HAS BEEN INFORMED OF THE POSSIBILITY OF SUCH DAMAGES IN ADVANCE. THE LIMIT OF EMPIRE' LIABILITY FOR ANY DAMAGES ARISING HEREUNDER SHALL IN ANY EVENT BE NO MORE THAN THE TOTAL FEES PAID TO EMPIRE HEREUNDER, IF ANY.

11. Non-Disparagement. Each Party agrees for itself and all others acting on its behalf, either directly or indirectly: (i) Not to publish, repeat, utter and/or report any statement or observation, nor to take, encourage, induce or voluntarily participate in any conduct or action, that would negatively comment and/or reflect on, disparage, defame, impugn and/or call into question any other Party and/or any other Party's business operations, policies, practices and/or conduct or that of its directors, officers, members, shareholders, agents, employees, and/or affiliates; (ii) Not to act in any way with respect to any other Party's business operations, practices, policies and/or conduct that would impugn and/or damage any other Party's reputation, business relationships or present or future business, or the reputation of any other Party's past or present directors, officers, members, executives, shareholders, agents, employees or affiliates; and (iii) Not to comment about any other Party to any person or entity, including, but not limited to, the press (in any medium or format) or any other Party's customers and/or vendors concerning any Party's business operations, policies or conduct and/or actions. All Parties acknowledge that this provision is a material term of this Agreement, the violation of which shall be deemed a material breach hereunder.

12. General Provisions.

a. Relationship of the Parties. The relationship of the Parties established by this Agreement is solely that of independent contractor, and nothing contained herein shall be construed to (i) give any Party the power to direct and control the dayto day activities of the other Party; or (ii) constitute such Parties as partners, joint venturers, coowners or otherwise as participants in a joint or common undertaking; or (iii) make either Party an agent of the other Party for any purpose whatsoever except as otherwise agreed in writing by the Parties hereto. Neither Party shall be treated as an employee of the other Party for federal or state tax purposes, unemployment or disability benefits, or for any other withholding tax or insurance purposes. Under no circumstances shall a Party hold itself out as an agent, employee, joint venturer, or partner of the other Party. Neither Party shall have any authority to bind the other Party to any contract or agreement unless expressly agreed to in writing.

b. Amendments. This Agreement may only be amended by an instrument in writing signed by both Parties. This Agreement shall be construed without regard to the Party that drafted it. Any ambiguity shall not be interpreted against either Party and shall, instead, be resolved in accordance with other applicable rules concerning the interpretation of contracts.

c. Compliance with Laws. Each Party shall comply with all applicable federal, state, local, or other laws and regulations applicable to such Party relevant to this Agreement.

d. No Conflict with Other Agreements. CLIENT represents that it is free to enter into this Agreement and that this engagement does not violate the terms of any agreement between the CLIENT and any third party. Further, CLIENT, in rendering its duties, shall not utilize any invention, discovery, development, innovation or trade secret in which it does not have a proprietary interest. During the term of this Agreement,

CLIENT shall devote as much of its productive time, energy and abilities to the performance of its duties hereunder as is necessary to perform the required duties in a timely, professional and productive manner as is specified by EMPIRE. EMPIRE represents to CLIENT that it may hold itself out as an independent contractor to other firms and companies, and may continue to do so during the term of this Agreement and thereafter, and such services shall not be deemed to be competitive with the services provided hereunder.

e. Governing Law. This Agreement and all Exhibits hereto shall be governed by and construed and enforced in accordance with Pennsylvania law, without giving effect to any state's conflicts of law principles. All disputes and claims relating to this Agreement, the rights and obligations of the parties hereto, or any claims or causes of action relating to the performance of either party that have not been settled through mediation will be settled by arbitration by the American Arbitration Association in Bucks County, PA in accordance with the Federal Arbitration Act and the Commercial Arbitration Rules of the American Arbitration Association. The costs of the arbitration proceedings will be borne by the losing party if such party is found to have been in material breach of its obligations hereunder. Each Party waives its right to a trial by jury for resolution of any disputes between the Parties arising from or in connection to this Agreement.

f. Attorneys' Fees and Costs. In any litigation or arbitration arising out of or related to this Agreement, the non-prevailing Party shall pay the prevailing Party's costs and expenses including, but not limited to, reasonable attorneys' and expert witness fees.

g. Force Majeure. EMPIRE shall not be liable for delays or any failure to perform the Services or this Agreement due to causes beyond its reasonable control. Any such excuse for delay shall last only as long as the event remains beyond EMPIRE's reasonable control. However, EMPIRE shall use its best efforts to minimize any such delays. EMPIRE must keep CLIENT reasonably informed of its plans to resume performance.

h. No Waiver. The failure of either Party at any time to require performance by the other Party of any provision of this Agreement shall in no way affect that Party's right to enforce such provisions, nor shall the waiver by either Party of any breach of any provision of this Agreement be taken or held to be a waiver of any further breach of the same provision or any other provision.

i. Binding Agreement. This Agreement shall benefit and be binding upon the Parties and their respective successors and permitted assigns.

j. Severability; Contract Construction. If any provision contained in this Agreement is held unenforceable, such provision shall be modified so that such provision is enforceable to the fullest extent allowed by law. In the event the provision cannot be so modified, it will be stricken without affecting the remaining provisions of this Agreement provided that without the provision this Agreement will continue to satisfy the intent of the Parties as set forth in this Agreement. The use of a term in the singular shall include the term in the plural. The headings are for reference only. Any reference to days is to calendar days, unless otherwise specified.

k. Notices. All notices, demands and all other communications provided for in this Agreement shall be in writing and shall be deemed to have been duly given when (a) personally delivered, (b) deposited prepaid with a nationally recognized delivery service (such as Federal Express), (c) deposited prepaid in the United States mail, certified with return receipt requested, or (d) transmitted electronically by fax or electronic mail provided the sender receives an automated confirmation of delivery. All notices must be addressed to the Party at the address in the signature block below. A Party may change its address in writing in accordance with this Section 10(k), except that notices of change of address shall be effective only upon receipt.

l. Assignment. Either Party may assign or subcontract this Agreement, or the rights or duties created by this Agreement only with the prior written consent of the other Party. Either Party, at the Party's sole election, may assign any and all of its rights and obligations under this Agreement to any entity in which or with which the Party is sold, merged or consolidated.

m. Cumulative Remedies. All rights and remedies of each Party shall be in addition to all other rights and remedies available at law or in equity, including, without limitation, specific performance, and temporary and permanent injunctive relief.

n. Controlling Provision. To the extent of any express conflict between the provisions of this Agreement and the provisions of an Exhibit, the provisions of the Exhibit shall control.

o. The terms of EMPIRE's Privacy Policy and Terms of Service are incorporated herein by reference.

p. Signatures. This Agreement may be executed in one or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same Agreement. Electronically transmitted signature pages shall be deemed originals for all purposes.

In witness whereof, the Parties have duly executed this Master Service Agreement effective as of the Effective Date.


Empire Holdings Group, LLC  By: _____ Name: Peter Pru Title: CEO	[_____] By: _____ Name: _____ Title: _____
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EXHIBIT A

STATEMENT OF WORK (SOW)

THIS STATEMENT OF WORK (this “Statement of Work” or “SOW”) is made and entered this day of _____ (the “SOW Effective Date”) by and between Empire Holdings Group, LLC a Wyoming Limited Liability Company with offices at 2370 York Rd., Jamison, PA 18929 (“EMPIRE”), and _____ having a principal place of business at _____ (“Client”) and shall be incorporated into the Master Services Agreement (“MSA”) agreed to amongst the Parties as even date with the SOW Effective Date. By signing below, Customer acknowledges and agrees that it has read the MSA and agrees to be fully bound to its terms. Words in initial capital letters not defined herein shall have the meaning set forth in the MSA. EMPIRE and Client are each a “Party” and collectively the “Parties” hereto. In consideration of the mutual covenants and conditions contained in this SOW, and intending to be legally bound hereby, the Parties mutually agree as follows:

1. Services. Subject to the terms of the Agreement, EMPIRE shall provide “Services” including but not limited to:

“Ecommerce Platinum Program”

1. Ecommerce Subscription Sales Funnel Build

- Niche Selection & Validation
- Offer Selection & Creation
 - i. Frontend Offer
 - ii. Order Bump
 - iii. Upsell Products
 - iv. Subscription Upsell Product
 - v. Thank You Page
 - vi. 2 Bonus Information Products
- Subscription Sales Funnel Build
 - i. Landing Page
 - ii. Order Form
 - iii. Order Bump
 - iv. Upsell #1
 - v. Upsell #2
 - vi. Upsell #3 - Subscription Product
 - vii. ThankYouPage
- Abandoned Cart Email Automation - 3 Emails
- Post Purchase Email Automation - 1 Email
- Sales Funnel Copywriting
 - i. Landing Page
 - ii. Order Form
 - iii. Order Bump
 - iv. Upsell #1
 - v. Upsell #2
 - vi. Upsell #3 - Subscription Product
 - vii. ThankYouPage
- Advertising
 - i. At least 1 piece of advertising copy
 - ii. At least 3 pieces of advertising creatives
 - iii. \$250 in advertising spend to test funnel
- Phone Call Support

- i. Two strategy calls during funnel build process

2. Team Support Access For 4 Months

- Access To Inner Circle Recordings Library
- Access To Inner Circle Advanced Trainings Library
- Three Inner Circle Zoom Calls Per Week
- On Demand Support Within BaseCamp Dashboard

2. Term. This SOW shall be effective as of the SOW Effective Date and shall continue until terminated in accordance with the MSA between the parties.

3. Fees/Commissions. Client agrees to pay the following Fees and/or Commissions in accordance with the terms of the MSA. Except as expressly provided in this SOW, Client shall pay all Fees net thirty (30) days from the invoice date.

Chargeback Policy: In the event CLIENT files a Chargeback against Empire Holdings Group accidentally or otherwise and the Chargeback is not decided in CLIENT's favor – CLIENT will be charged an administrative response processing fee of \$500.00 on behalf of Empire Holdings Group. It is strongly encouraged that CLIENT contact our Customer Processing Department at peter@ecommerceempirebuilders.com to assist CLIENT with any billing concerns before considering filing a Dispute or Chargeback with CLIENT's bank or Credit Card Company.

Guarantee of Service: Pursuant to the terms of this Agreement, Empire hereby guarantees that if Client diligently applies the recommended methods and strategies for promoting its eCommerce business, but fails to recover the purchase price within an 18-month period, Empire will offer to purchase Client's business from Client under the specified Terms and Conditions.

Terms and Conditions:


1. Client must have acquired the Ecommerce Platinum Program and strictly adhered to the implementation of the provided methods and strategies for promoting their eCommerce business.
2. The 18-month period shall commence on the date of the Ecommerce Platinum Program purchase.
3. Client must provide detailed records and evidence demonstrating their consistent application of the recommended methods and strategies throughout the 18-month period, as well as financial records substantiating their claim of not recovering the purchase price.
4. In the event that the Client meets the above criteria and wishes to proceed with the business buyback, they must submit a written request to us within 30 days following the conclusion of the 18-month period.
5. Upon receipt of the written request and verification of the Client's eligibility, we will negotiate the terms of the buyback agreement in good faith, including the business valuation and payment structure.
6. This Guarantee of Service is not transferable and shall apply solely to Client, as the original purchaser of the Ecommerce Platinum Program.

Payment Terms: The service is billed one time or monthly basis and is non-refundable. There will be no credits or refunds for partial months of service. If CLIENT subscribes to any of the paid portions of the Services, CLIENT understands that once CLIENT has become a Subscriber, CLIENT's subscription will be automatically renewed and CLIENT's credit card will be charged based on the subscription program (e.g., monthly). Payment is due on the defined recurring billing date. Service will be interrupted on accounts that reach 10 days past due. In the event a payment installment plan is indicated per agreement and is not paid within 30 days or less, Customer will only receive completed services (Ecommerce Platinum Program) in Customers account. No further services will be provided by Empire Holdings Group in reference to but not limited to advertising or Team Support Access.

SERVICES: Ecommerce Platinum Program Billing Amount \$ \$10,000

*Empire Holdings Group Guarantees completion of services outlined in the scope of work within 30-45 days of conducting CLIENT scheduled kickoff call

4. General. Amendments to this SOW are governed by the MSA and must be in writing and executed by both Parties. The MSA, together with this SOW (as incorporated under the MSA) and any associated SOWs referenced herein constitute the entire agreement between the parties with respect to the subject matter of this SOW. To the extent that there is any inconsistency between the MSA and this SOW, the terms of this SOW shall control. This SOW is accepted and agreed by the Parties as of the SOW Effective Date. The individuals signing below represent they have authority to bind the named Parties to this SOW.

EMPIRE HOLDINGS GROUP LLC	_____
By (Signature): 	By (Signature):
Name (Printed): Peter Pru	Name (Printed):
Job Title: CEO	Email:

Attachment I

OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. 2423002
DATE RECORDED: OCTOBER 10, 2023
TRANSCRIBED: JANUARY 14, 2023
PAGES 1 THROUGH 24

ECOMMERCE EMPIRE BUILDERS - CALL 3

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1 FEDERAL TRADE COMMISSION

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4 RECORDING:

PAGE:

5 Ecommerce Empire Builders - Call 3

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1 FEDERAL TRADE COMMISSION

2

3 In the Matter of:)

4 2423002)

5)

6 -----)

7 October 10, 2023

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11 The following transcript was produced from a
12 digital file provided to For The Record, Inc. on
13 December 4, 2023.

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1 P R O C E E D I N G S

2 - - - - -

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4 ZOOM: -- recorded. You have been added to
5 the waiting room. You cannot talk or listen until the
6 host admits you to the meeting.

7 TOM: Hey, [REDACTED] Can you hear me?

8 REEVE TYNDALL: Yep, I can hear you.

9 TOM: I can't see you quite yet. Is your --
10 is your video working?

11 REEVE TYNDALL: No, I -- this is a really
12 old computer at my mom's place. But I can see you.

13 TOM: Okay. (Inaudible). I see you -- we
14 did the call and then you did -- I think -- are you on
15 your phone, too, or --

16 REEVE TYNDALL: Yeah, yeah. I'm on my mom's
17 computer and then I just -- I called in.

18 TOM: Oh, gotcha. Yeah, no worries. We're
19 good. If you want to go on audio on your -- or video
20 on your phone, that would be fine, as well.

21 But I got the agreement. Everything make
22 sense in the agreement?

23 REEVE TYNDALL: Yeah, yeah. I -- yeah, it
24 makes sense. And I -- I reviewed -- I reviewed all
25 the stuff you sent me.

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1 TOM: Yeah. Okay. Well, good stuff. Yeah,
2 so next step would be we just make some type of
3 arrangement for the program. You could either do, you
4 know, like ACH, you know, a bank check, bank number,
5 routing number, or just do a credit or debit card.
6 And then we'd get you on Steve's calendar to book your
7 -- your one-on-one call with him, and then we'd start
8 with niche and then product selection on that call.
9 And then we got -- we would start the -- the build of
10 your business after the call.

11 REEVE TYNDALL: Okay.

12 TOM: Make sense?

13 REEVE TYNDALL: Yeah. I mean, I just -- I
14 did have a couple of questions if you have --

15 TOM: Yeah.

16 REEVE TYNDALL: -- if you have a second.
17 Yeah, so I'm just trying to, like, game plan out,
18 like, the next few months, like -- just, like, cash
19 flow-wise. Could you kind of, like, talk me through
20 that?

21 TOM: Game -- how do you mean specifically
22 so I can help you? Ask that again.

23 REEVE TYNDALL: Just, like, cash
24 flow-wise --

25 TOM: What do you mean by game plan out? Go

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1 ahead.

2 REEVE TYNDALL: Like, cash flow, like --
3 because it's like a new business, like the expenses
4 and revenue and stuff like that.

5 TOM: So it will be minimal. Yeah, it's
6 going to be minimal. So it's maybe the one-time, you
7 know, 10K investment, the full build, and then the
8 mentoring and supporting you afterwards. But when we
9 go live, okay, it's around day 35, Peter does suggest
10 about 30 bucks a day for the first 30 days in ads,
11 okay, which we'll walk you through. That's going to
12 scale your positive assets, you know, to really get
13 momentum with the whole business. Okay?

14 REEVE TYNDALL: Okay.

15 TOM: And after that our goal is to have the
16 business moreso feed itself after -- after that, okay?
17 So basically take a certain percentage of the sales
18 and put it into marketing for the following month.
19 And we -- and we'd walk you through that in detail.
20 Okay?

21 And then the other costs as far as the -- to
22 run the business is going to be the file software.
23 Okay? And that's pretty minimal. It's around 70
24 bucks a month. And that's basically the engine of
25 your car. It's going to run all the sales pages and

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1 build up the emails, et cetera.
2 REEVE TYNDALL: Okay.
3 TOM: Make sense?
4 REEVE TYNDALL: So is that --
5 TOM: Yeah, so it's going to be -- it's
6 going to be minimal.
7 REEVE TYNDALL: Okay. So it's 10,000 up
8 front and then you said 70 dollars --
9 TOM: That's for wholesale --
10 REEVE TYNDALL: -- plus 30 dollars --
11 TOM: -- and then us mentoring/coaching you.
12 Go ahead.
13 REEVE TYNDALL: So it's 70 plus 30, so about
14 \$100 a month?
15 TOM: No, not 100 a month. So it's 30 bucks
16 a day for the first 30 days, he recommends. You don't
17 have to spend that. I mean, you could do 20 bucks a
18 day for the first 30 days.
19 REEVE TYNDALL: Okay.
20 TOM: But once we build the business and get
21 it selling, at around day 30/35, that would be the --
22 you expect that for about -- for your -- your paid
23 ads, you know, ballpark. Okay?
24 REEVE TYNDALL: Okay. And I would -- so I
25 would start --

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1 TOM: (Inaudible) ads.

2 REEVE TYNDALL: -- paying that on -- after
3 the first month, then, or --

4 TOM: Yeah. You don't need that right away
5 because the build -- it's going to take us -- just to
6 -- just about a full month to build your business.
7 But once we hand it over to you and the business is
8 selling and we show you how to run it, then, you know,
9 about 20 to 30 bucks a day, you know, to scale the
10 business the first 30 days.

11 REEVE TYNDALL: Okay. And then --

12 TOM: Yeah.

13 REEVE TYNDALL: -- so could you explain to
14 me a little bit more about the -- like, the drop
15 shipping and how that works?

16 TOM: Hmm, yeah. So I like the outdoor
17 niche myself. But let's say you're in the outdoor or
18 fishing niche, whatever it may be, this flashlight if
19 you see. So let's say, you know, I buy -- I see this
20 on your Instagram, an ad on Instagram, okay, and I buy
21 this flashlight from you, this would get shipped right
22 from the warehouse in the states here in the U.S., it
23 would get shipped right to my doorstep. So you do not
24 have any money tied up in inventory, and it gets
25 shipped right from the manufacturer, right to the

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1 customer's doorstep, which is myself. So does that
2 make sense? And we set that up -- we set the back end
3 of the fulfillment process up for you, as well.

4 REEVE TYNDALL: Okay. Okay. And then,
5 like, are they -- do I have to -- what are the -- are
6 there any costs associated with that, or --

7 TOM: No. There's going to be -- it's drop
8 shipped directly from the manufacturer. So once you
9 make a sale, that money goes and it gets fulfilled
10 from the warehouse to the customer, and then you get
11 the percent -- the profit margin on that, in a sense.

12 REEVE TYNDALL: Okay. And then how --

13 TOM: You're not going to have any money
14 tied up in inventory.

15 REEVE TYNDALL: Okay. And then how do I --
16 how do I get the -- collect the money from the
17 customers?

18 TOM: Yeah. Then we build that -- that all
19 in, you know, with you. Okay? But it's going to be
20 the merchant account linked right to your bank
21 account, and then, you know, once that person places
22 -- you know, either on the computer or your phone, on
23 their phone, they plug it in, purchase now, the buy
24 button, that's going to be your -- your merchant
25 account, and that will shoot it right into your --

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1 your bank account.

2 REEVE TYNDALL: Okay. So do I have to apply
3 for a merchant account?

4 TOM: We show you how to do that, you know,
5 usually just through Stripe, et cetera. It's easy-
6 peasy.

7 REEVE TYNDALL: Okay.

8 TOM: But we link all that up for you. So
9 you just -- we're building all the business for you.
10 We're -- all the marketing, all the ads, product
11 selection, we're doing all that for you. Okay? But
12 we just need you to do a -- a few ads and things, like
13 the merchant account, set up your -- you know, going
14 to a bank and set up a bank account, you know, for --
15 for the business.

16 REEVE TYNDALL: Okay. And --

17 TOM: It's pretty -- pretty easy.

18 REEVE TYNDALL: And then so you'll help me
19 find the products to sell, and then, like --

20 TOM: Well, not help. Not help. We do it
21 for you, 100 percent. Okay? We're doing the full
22 build of the business. We're doing all the product
23 selection, 100 percent, for you.

24 REEVE TYNDALL: Okay. And --

25 TOM: Yeah.

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1 REEVE TYNDALL: But in the -- it said in the
2 -- in the contract you sent that it's -- it's only for
3 four or five months. Is that right, or --

4 TOM: Yeah. That -- well, that's -- that's
5 -- our -- as far as our investment. So if you want to
6 keep auto-renewing, you know, as far as, you know, buy
7 a couple more months of support, you know, then you
8 can just do that. That -- we would prorate that
9 investment.

10 REEVE TYNDALL: Oh, okay.

11 TOM: You know, 500, maybe 1,000 a month,
12 depending on how involved you want to be in the
13 business.

14 REEVE TYNDALL: Okay. I mean, can I -- and
15 you're -- and you're -- for other people, do you -- do
16 they just keep selling the same product, or do you
17 have -- have to start selling different products?

18 TOM: That's why we put so much energy in
19 product selection up front. So we have Evergreen
20 products. What I mean by Evergreen, we're making
21 sales consistently 12 months out of the year. Okay?
22 So it's more -- you have that more consistent, you
23 know, cash flow. And then also want longevity, right?
24 We don't want a product to crash after 15 months. So
25 we definitely want multiple year life spans of our

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1 products. So that's going to be all what we take into
2 account when we do product research.

3 REEVE TYNDALL: Okay. Okay.

4 TOM: Yeah.

5 REEVE TYNDALL: And so, like, I saw the link
6 you sent about, like, different people in the program
7 and stuff. And it seemed like there was, like, some
8 people seemed to make more money than other people.
9 It --

10 TOM: It is variable. People have different
11 motivations -- motivation levels, yeah.

12 REEVE TYNDALL: Oh, okay. Well, like --
13 like, because you're doing it, but, like, why -- why
14 is there, like, a difference?

15 TOM: How do you mean? Ask that again.

16 REEVE TYNDALL: Oh, like -- so, like, if --
17 because you're -- you said that you're picking the
18 products and running the business. Like, why is there
19 such a wide range?

20 TOM: Oh, we're -- we're building it, and
21 then we're handing it over to yourself the first --
22 the first 30 days. So we're doing it with you after
23 we build the business.

24 REEVE TYNDALL: Oh, okay. Okay. So,
25 like --

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1 TOM: Yeah.

2 REEVE TYNDALL: -- what -- what would be
3 some things that I should, like, keep in mind to be
4 successful?

5 TOM: Show up and just do -- I mean, it
6 ain't brain surgery. Just show up and, you know, do
7 the work with us, you know, after we build it for you.
8 It ain't -- it ain't brain surgery. So don't be -- I
9 know it's new to you right now, but after a few weeks
10 you're going to know what to do when the -- how the
11 whole process works.

12 REEVE TYNDALL: Okay.

13 TOM: So it's just, you know, show up with
14 us and we'll -- you know, we'll get you to where you
15 need -- need to be.

16 REEVE TYNDALL: Okay. Yeah, that -- that
17 sounds good. Is -- is there anything else I should --
18 I should know about the business, or --

19 TOM: I mean, good questions. We pretty
20 much covered the whole thing. And that's kind of why
21 I sent you those -- those videos to review, as well.
22 It kind of gives you an overview of the whole process.
23 And then obviously you -- you reviewed the agreement,
24 you know, the full build of the business and then the
25 duration of support that's included, as well.

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1 So, yeah, I mean, you asked good questions.
2 I mean, it's pretty much, you know, covered -- you
3 know, covered the whole process in detail. It's just,
4 you know, showing up, you know, working, engaging with
5 us, communicating with us. We're not -- we're not
6 mind readers, right? So we need you to show up and
7 communicate with us. If you do need a -- the
8 occasional hand, and then, yeah, I mean, it's -- it's
9 a process. Each week will build on top of themselves,
10 you know, as we go through and progress.

11 REEVE TYNDALL: Okay. And is there any,
12 like, stores that I could look at of, like, other
13 people that are doing it, or -- just to see what it's
14 like?

15 TOM: Yeah. So the reason why we don't do
16 that -- yeah, the reason why we don't do that is
17 because you can back engineer, you know, stuff, and
18 just with compliance, et cetera, the -- the same thing
19 goes for yourself, [REDACTED] If I bring you on and you're
20 selling, you know, the first, you know -- you know,
21 four or five weeks in, I'm not going to send your
22 store out to every Tom, Dick, and Harry, you know,
23 that comes on a Zoom call. They're like, hey, you
24 know, like, oh, yeah, here's [REDACTED] store, look at --
25 look at this, you know?

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1 So just with quality compliance we -- we
2 don't, you know, do that. I mean, but you can just go
3 on a simple -- I mean, if you search, you know,
4 bulldog toys, you know, on Instagram, you're going to
5 start seeing ads and that just gives you a simple
6 splash page. You know, can I give you feedback on
7 that?

8 REEVE TYNDALL: Sure.

9 TOM: Yeah. So -- and I know this is new to
10 you. But the more intelligent -- a lot of those sales
11 pages are very -- that's not really the bread and
12 butter, okay, as far as looking at a certain sales
13 page. It's going to give you a visual, but, you know,
14 that doesn't really -- the bread and butter of getting
15 these businesses to work, and that's why we do it for
16 you, is specific production selection and then having
17 a compelling offer specifically talking to that
18 targeted audience.

19 So that -- that -- you know, respectively I
20 want to challenge you, and that -- that should more be
21 the question that you're -- you should be asking, you
22 know, for the answer that you're -- you're looking
23 for. Because that's the sweet spot, getting a
24 compelling offer and products in front of -- laser-
25 targeted in front of an audience that is hungry and

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1 they're going to up their wallet for those products
2 over and over.

3 Are -- are you with me there?

4 REEVE TYNDALL: Yeah. No, no, that -- that
5 makes sense.

6 TOM: Yeah.

7 REEVE TYNDALL: Okay. And then the -- I was
8 -- I was just doing -- looking online for, like,
9 starting a business and stuff, and -- and it said that
10 I should -- I should have, like, a pro forma of, like,
11 expenses and revenue and all of that sort of stuff.

12 TOM: We -- we walk you through -- we walk
13 you through the whole process so you can track your
14 data, your sales, revenue, et cetera, profit margin.
15 We have -- we have -- and that's going to be built
16 into the storefront, as part of the storefront, to
17 where you have that data analytics, you know, that can
18 have visuals for.

19 REEVE TYNDALL: Okay. What --

20 TOM: Yeah. And we help show you how -- no,
21 go ahead.

22 REEVE TYNDALL: What -- what type profit
23 margins do you -- should I expect to get?

24 TOM: Yeah. Ballpark, I mean, front end
25 sales, we want to shoot for 30/40 percent profit

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1 margin. And the back end subscriptions sales, okay,
2 people that are going into upsells and downsells of
3 the back end sales, we want to shoot for like 50 to 80
4 percent profit margin on that. Okay?

5 And why is that? Why is that big variation?
6 Well, because you already ran the ad. You already
7 have the customer's email and phone to (inaudible)
8 which, you know, we -- we -- we write that copy for
9 you, as well, you know, emails, et cetera, to market
10 to them and sell products to them, you know, because
11 they're already in your ecosystem. You're going to
12 have a lot higher profit margin on back end sales.

13 Does that make sense?

14 REEVE TYNDALL: Yeah, no, that -- that makes
15 sense. And so, like, the subscription -- like, what
16 are those? Are those, like -- like -- like razors
17 and, like, toilet paper and stuff like that, or, like,
18 what are -- what's --

19 TOM: I mean, that's a big misconception.
20 We're not -- we're not competing with Procter and
21 Gambler or Crest white -- you know, they're billion
22 dollar, you know, hundred-year-old companies. We're
23 not competing with that type of thing, but moreso
24 people that are in the hobby niche that, you know,
25 people spend a lot of money on hobbies. Right?

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1 So, I mean, it could be, you know, getting
2 people into certain, you know -- you know, people in
3 the barbecue niche that we have people, you know,
4 auto-subscription certain barbecue items, or barbecue,
5 like, logs and stuff. All that -- that type of thing.
6 The outdoor niche, hunting niche, where we have people
7 that put people into a subscription, more of like an
8 electrolyte drink, okay, that people consume and
9 drink, obviously, and they get auto-shipped that every
10 single month, that electrolyte powder, so stuff like
11 that.

12 REEVE TYNDALL: Okay. And --

13 TOM: I mean, you could -- fishing clubs,
14 and you can send people, you know, bass fishermen down
15 in Texas, you know, for example, you can send -- you
16 can auto-ship, you know, lures, you know, every month,
17 et cetera.

18 REEVE TYNDALL: Okay. And --

19 TOM: For example.

20 REEVE TYNDALL: And so, like, Peter
21 mentioned the -- like Amazon and Walmart. It sounds
22 like I'm going to be, like, competing with them, which
23 sounds kinda scary.

24 TOM: Yeah. No, we're -- we're not -- we're
25 not competing. The reason why we're not competing,

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1 we're laser-focused on a targeted niche, okay? So
2 this isn't a blanketed thing, okay? So we're -- we're
3 focused -- we're having -- we're having our product
4 selection and we're having a compelling offer
5 specifically written towards those people. And we're
6 only marketing towards and catering towards that exact
7 demographic and niche.

8 REEVE TYNDALL: Okay. Okay. That -- that
9 makes sense.

10 TOM: So we're making it laser-focused and
11 specific.

12 REEVE TYNDALL: Okay.

13 TOM: Differentiating -- differentiating
14 yourself from every Tom, Dick, and Harry that's just a
15 general -- you know, a general type, you know -- you
16 know, shop type thing.

17 REEVE TYNDALL: Okay. Okay.

18 TOM: Yeah.

19 REEVE TYNDALL: And then if I want to go
20 ahead, you said I can do -- do an ACH?

21 TOM: Yeah, that's going to save you the 3
22 percent for the processing credit card charge. If you
23 want -- you can put it on a credit card if you want,
24 but it would be the -- the 3 percent on that, just to
25 be, you know, transparency.

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1 REEVE TYNDALL: Yeah.

2 TOM: So if this is something that you want
3 to move forward with, we would just do that on Zoom
4 face-to-face. And it's pretty basic. You just need
5 your bank number and then your routing number, and
6 then we initiate the -- the transaction, and then we'd
7 get you full access to the whole -- book your first
8 call with Steve for the welcome call.

9 REEVE TYNDALL: Okay. Okay.

10 TOM: Are you ready to get this -- get this
11 rocking and rolling?

12 REEVE TYNDALL: Sure.

13 TOM: Yeah. Well, congratulations, first
14 and foremost. Feeling good?

15 REEVE TYNDALL: Yeah. I feel good, yeah.

16 TOM: Good stuff. So what we'll do here --
17 and I got your -- I'll get your welcome pack. That's
18 pretty easy to -- to craft. I'm going to confirm all
19 your information for our coaching team. Okay? That
20 way just in case we've got to -- hey, you know, we've
21 got to call you or text you, we can get a hold of you.

22 So the 502-483-1095, is that going to be
23 your main number, then, you want on file?

24 REEVE TYNDALL: Yeah, yeah. That -- that's
25 my cell.

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1 TOM: Okay. And then the
2 [REDACTED] gmail is where we'll send all the
3 credentials.
4 REEVE TYNDALL: Yeah, yeah. So [REDACTED] --
5 [REDACTED] is my legal name, but I go by [REDACTED]
6 TOM: Oh, it is? Okay. I was going to one
7 -- that -- that's cool. But, yeah, we'll send all the
8 passwords, logins, credentials, to there. And then
9 I'll get you logged in. I'll do a screen-share so you
10 can see what I'm doing here, plugging in your
11 information, just so you're -- we can do it together.
12 Can you see my screen?
13 REEVE TYNDALL: Yeah, I can see --
14 TOM: Are you with me, [REDACTED]
15 REEVE TYNDALL: I can see your screen.
16 TOM: Okay. I just wanted to share. That's
17 what we would plug -- we would plug in for the ACH.
18 REEVE TYNDALL: Oh, okay.
19 TOM: Yep. So, [REDACTED] [REDACTED] Is that going
20 to be the name on the account, or is it [REDACTED] [REDACTED]
21 REEVE TYNDALL: Oh, [REDACTED] is on the
22 account.
23 TOM: Okay. (Inaudible) how do I spell
24 that? W-h-i-t-n-e-y?
25 REEVE TYNDALL: Yep, you got it.

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1 TOM: Okay. And then the \$10,000 for the
2 investment. Is it going to be personal checking?

3 REEVE TYNDALL: Yeah, it's -- it's -- it's a
4 checking account.

5 TOM: Okay. And then what's going to be the
6 -- the address that we're going to be using?

7 REEVE TYNDALL: I think that I have my mom's
8 address.

9 TOM: That's fine, yeah.

10 REEVE TYNDALL: Are you sure? You know, I
11 gotta check. I don't know if my checking account has
12 my mom's address or has my address at home. Hold on.

13 TOM: What would be your best guess?

14 REEVE TYNDALL: Oh, God. I should know
15 this. I work for a bank.

16 TOM: If it's -- it's probably linked to
17 both addresses. We should be fine. Because, you
18 know, if it was, like, hey, you know, maybe you
19 started it and then you moved into, like, your own
20 house or apartment. But if it was -- if it's still --
21 if you, like, created it, it should be fine. So if
22 you want to use -- I guess maybe just use your mom's
23 if that'd be your best guess, because it should be,
24 you know --

25 REEVE TYNDALL: Yeah, hold on. Let me --

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1 let me check. Hold on.

2 TOM: Yeah.

3 (Brief pause.)

4 REEVE TYNDALL: My name is Reeve Tyndall.

5 I'm an investigator with the Federal Trade Commission.

6 That was a Zoom conversation with a Tom Etikowski (ph)

7 at Ecommerce Empire Builders. The date is October

8 10th, 2023. The time is now 3:53 p.m. Eastern time.

9 (The recording was concluded.)

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